



CARDD
MEPA ROUTING MEMO

To: Mark Bostrom
Through: Autumn Coleman
From: Demi Blythe

Re: MEPA Adoption for Whitehall Water Treatment Plant
Project Sponsor: Town of Whitehall
Name of Project: Whitehall Water Treatment Plant
Agreement No: RRG-20-1769

Memo:

DNRC can issue an Adoption Notice for the USDA Rural Development Environmental Report and US Army Corps of Engineers EA and FONSI for the Whitehall Water Treatment Plant Project (attached). **SIGNATURE REQUIRED**

 ^{DS} DEB_ MEPA/NEPA Coordinator Review

 ^{DS} Bureau Chief Review

 Division Administrator Signature

_____ Post for _30_ Days on DNRC's Environmental Docs page.

_____ File

NATURAL RESOURCES AND CONSERVATION



GREG GIANFORTE, GOVERNOR

1539 ELEVENTH AVENUE

STATE OF MONTANA

DIRECTOR'S OFFICE: (406) 444-2074
FAX: (406) 444-2684PO BOX 201601
HELENA, MONTANA 59620-1601

DECISION NOTICE ADOPTION OF EXISTING ENVIRONMENTAL REVIEW

Whitehall Water Treatment Plant
Winter 2021/2022
Town of Whitehall
45.87, -112.1
Jefferson County

Existing Environmental Review Document: USDA Rural Development ER and USACE FONSI/EA
Attached Below

Type and Purpose of Action

The primary purpose of the Uranium Project is to provide clean drinking water to the residents of the Town of Whitehall. Whitehall's drinking water is high in arsenic and uranium to levels above the EPA established MCL. The Town has been in violation of the MCL since 2015 and has entered an Administration Order On Consent (AOC) with the Montana Department of Environmental Quality (DEQ) to address the problem. Failure to meet the conditions of the AOC constitutes a violation of Title 75, chapter 5, part 6, MCA, and may result in the Department seeking a court order requiring additional corrective action and assessing civil penalties. The project will improve the Town of Whitehall's drinking water quality by removing arsenic and uranium. The project is also expected to improve the quality of the storm water runoff to tributaries of the Jefferson River.

The primary purpose of the Alternative 5 Project is to address problems with the existing tank and within the distribution system. In September of 2017, the Town contracted Midco Diving to conduct a tank inspection. The inspection found leaking and interior staining, lifting, corrosion, pitting, and coating failures of the 500,000-gallon existing tank. According to town officials the AC watermain in Rocky Mountain Drive is the only AC main left in the distribution system. All the other AC mains in town were replaced with the distribution system improvements project that was completed in 1996. The industry standard useful life of AC pipe is approximately 50 years. The AC main in Rocky Mountain Drive was installed in the mid 70's and is at or very near the end of its useful life. It is expected that by eliminating this last piece of AC main from the system, the DEQ required water sample for asbestos will also be eliminated. In addition to the AC pipe there are also problems in Rocky Mountain Drive with the locations of the curb stops. Many of the curb stops along this main have been installed on private property and in residents' yards which is problematic for public works in the event of a required service shutoff. Also, the newer commercial area of town that currently includes the Rodeway Inn Motel (formerly Super 8), a Town Pump, several businesses, a few vacant commercial lots, and a few existing residences are all currently fed by a dead-end main. Eliminating the dead-end main will increase the reliability of the water system and improve fire flows in this area.

The proposed project in Whitehall, Montana which is in Jefferson County, on Interstate 90, approximately 30 miles southeast of Butte and approximately 60 miles northwest of Bozeman, in Township 1N, Range 4W, Sections 3&4, and the tank is in Township 2N, Range 4W, Section 34. The approximate latitude and longitude of Whitehall is 45°52'12" N and 112°06' 03" W (Map attached below)

Explanation of the decision(s) that must be made regarding the proposed action (i.e. approve grant or loan and provide funding):

DNRC approved the loan to provide funding for the Whitehall Water Treatment Plant project.

Criteria for Adopting Existing Environmental Review

- ☒ The existing environmental review covers an action paralleling or closely related to the proposed action.
- ☒ The information in the existing environmental review is accurate and clearly presented.
- ☒ The information in the existing environmental review is applicable to the action being considered.
- ☒ All appropriate Agencies were consulted during preparation of the existing environmental review.
- ☒ Alternatives to the proposed action evaluated as part of the existing environmental review effort.
- ☒ The impacts of the proposed action been accurately identified as part of the existing environmental review.
- ☒ The existing environmental review identifies any significant impacts as a result of the proposed action and those identified will they be mitigated below the level of significance.

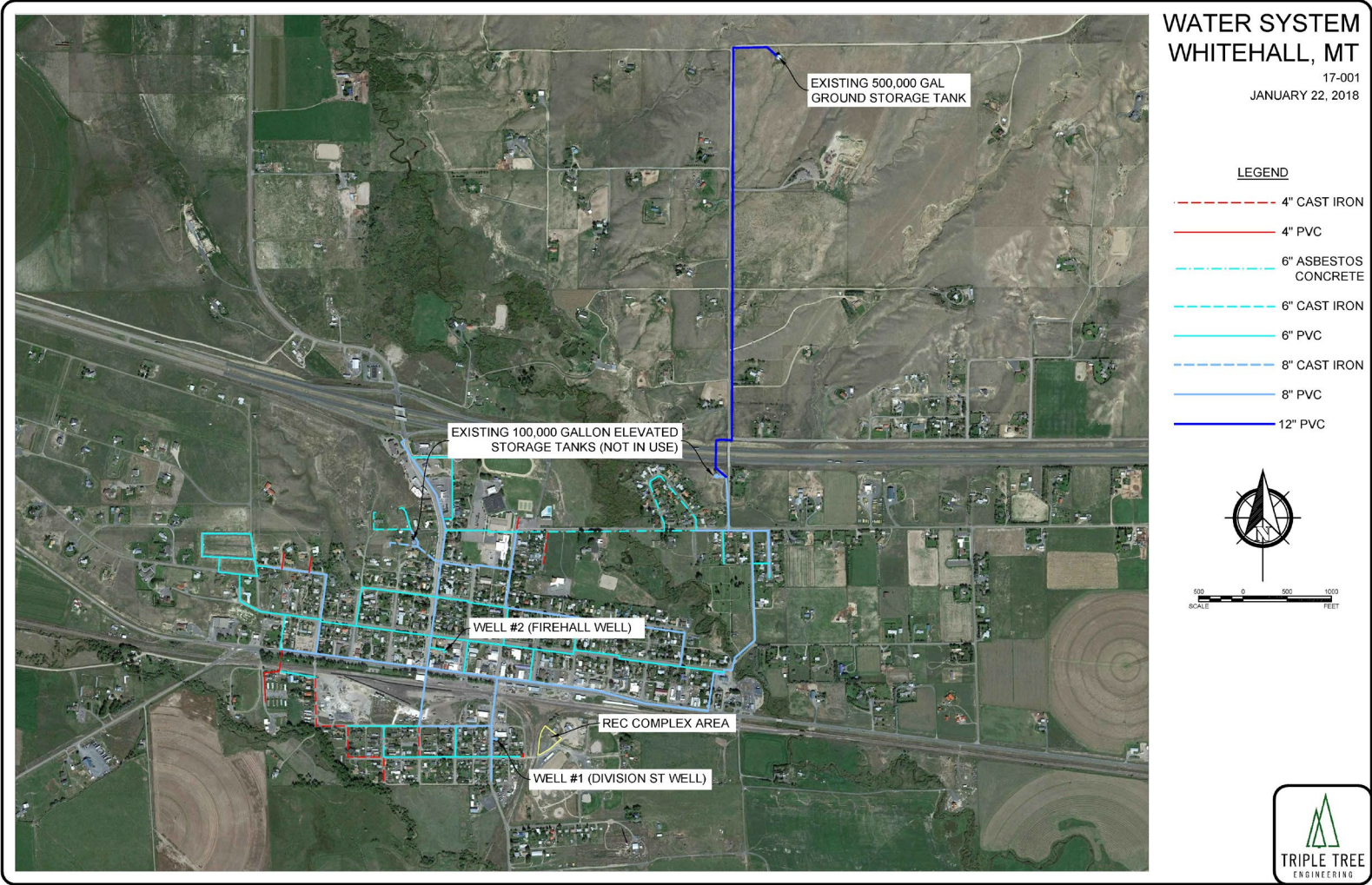
Adopt

The existing environmental review can be considered sufficient to satisfy DNRC's MEPA review responsibilities. No further analysis needed.

Existing Analysis Prepared By:	Name: Demitra Blythe Date: 8/9/2021 Title: CARD Division MEPA/NEPA Coordinator Email: Demitra.Blythe@mt.gov
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Approved By:	Name: Mark Bostrom Title: CARD Division Administrator
Signature:	<div data-bbox="354 1465 511 1480" data-label="Text"><small>DocuSigned by:</small></div> <div data-bbox="354 1480 597 1539" data-label="Text"><i>Mark W Bostrom</i></div> <div data-bbox="354 1539 552 1554" data-label="Text"><small>BF7A1C50B2AF4DE...</small></div> Date: 8/19/2021

Maps and Figures



FINDING OF NO SIGNIFICANT IMPACT

WHITEHALL TREATMENT FACILITY TOWN OF WHITEHALL, MONTANA

AUGUST 2020

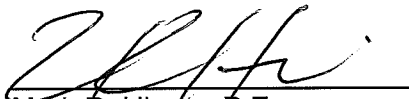
In accordance with the National Environmental Policy Act (NEPA) and its implementing regulations, the attached Environmental Assessment (EA) prepared by USACE, The Town of Whitehall, and Triple Tree Engineering describes the expected direct, indirect, and cumulative impacts of the proposed improvements to the Whitehall Treatment Facility on the existing environment. The U.S. Army Corps of Engineers, Omaha District (Corps) has independently evaluated the EA and determined that the EA adequately and accurately discusses the purpose and need, describes the existing environmental conditions, describes the environmental impacts, and provides appropriate mitigation measures in accordance with NEPA.

Alternatives analysis considered utilizing the new town hall shop to house the treatment equipment and utilizing two existing wells used as the water supply. A raw water pipeline would be constructed under the railroad and the existing wells would be rehabilitated. Multiple improvements would take place to the water tank and would be drained and removed from service temporarily during construction. The No Action alternative was eliminated because it was determined that an EPA non-compliant system was not sustainable. The Recommended Plan would increase the reliability of the water system.

All environmental, cultural, and economic factors relevant to the Recommended Plan were considered in the attached EA. No significant impacts are expected to occur to these resources as the resources either do not occur within the proposed project area or the construction is considered minor and temporary in nature and appropriate Best Management Practices would be implemented to avoid adverse impacts. The Recommended Plan will result in short term/minor construction-related impacts. These impacts include increased noise in the project area during construction and increased particulate matter from exhaust and dust generated by construction equipment. These impacts are considered temporary, are minimized with Best Management Practices, and pre-existing conditions will reestablish following construction.

After evaluating the anticipated environmental, economic, and social effects of the proposed activity, it is my determination that implementation of the Recommended Plan would not constitute a major Federal action that would significantly affect the quality of human environment. The proposed action has been coordinated with the appropriate resource agencies and the public, and there are no significant unresolved issues. Therefore, preparation of an Environmental Impact Statement is not required.

Date: 13 SEP 2020


Mark R. Himes, P.E.
Colonel, Corps of Engineers
District Commander



FINAL ENVIRONMENTAL ASSESSMENT

Whitehall Treatment Facility Whitehall, Montana

**U.S. Army Corps of Engineers
Northwest Division
Omaha District**

August 2020

TABLE OF CONTENTS

1.0 INTRODUCTION	5
1.1 Authority	5
1.2 Proposed Action.....	5
1.2.1 Project Location	6
1.3 Purpose and Need for the Proposed Action	7
2.0 ALTERNATIVES TO THE PROPOSED ACTION.....	8
2.1 Alternative 1 – No Action.....	8
2.2 Alternative 2 - Preferred Alternative	8
2.3 Alternatives Eliminated from Further Consideration	9
2.3.1 New Surface Water Source.....	9
2.3.2 New Ground Water Source.....	10
2.3.3 IX Treatment Plant at Rec Complex Using Existing Wells.....	11
2.3.4 IX Treatment Plant at Rec Complex Using 1 Existing Well and 1 New Well	11
2.3.5 IX Treatment Plant in Old Firehall Using Existing Wells.....	11
2.3.6 IX Treatment Plant at New Town Hall Using 1 Existing Well and 1 New Well	11
3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES	12
3.1 Environmental Setting	12
3.1.1 Climate.....	12
3.1.2 Geology.....	13
3.2 Resources Eliminated From Environmental Consequences Analysis	13
3.3 Relevant Resources.....	13
3.3.1 Air Quality	13
3.3.2 Water Quality.....	13
3.3.3 Wetlands	15
3.3.4 Aquatic Resources/Fisheries.....	16
3.3.5 Terrestrial Resources	16
3.3.6 Wildlife	17
3.3.7 Threatened and Endangered Species	18
3.3.8 Cultural Resources.....	19
3.3.9 Soils.....	20
3.3.10 Noise	20

3.3.11 Socioeconomics and Environmental Justice..... 21

4.0 CUMULATIVE IMPACTS..... 21

5.0 COORDINATION..... 22

6.0 COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS 22

7.0 PREPARER 25

8.0 LITERATURE CITED 26

APPENDICES

Appendix A – Agency Correspondence and Information

Appendix B – Floodplain, Wetland Maps, USFWS IPaC

ENVIRONMENTAL ASSESSMENT

Whitehall Treatment Facility Whitehall, Montana

1.0 INTRODUCTION

The City of Whitehall/Triple Tree Engineering/USACE has prepared this Environmental Assessment (EA) to evaluate the potential impacts of improvements to the Whitehall Treatment Facility. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 and the Council on Environmental Quality's (CEQ) Regulations (40 CFR 1500-1508), as reflected in the U.S. Army Corps of Engineers (Corps) Engineering Regulation ER 200-2-2.

This EA provides sufficient information on the potential adverse and beneficial environmental effects to allow the District Commander to make an informed decision on the appropriateness of an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). The finding of the EA determines whether an EIS is required. If the EA indicates that no significant impact is likely, then the Corps can release a FONSI and carry on with the proposed action.

1.1 Authority

The proposed action is authorized as part of Section 595 of the 1999 Water Resources Development Act, as amended. Section 595 allows for the Corps to provide design and construction assistance for water-related environmental infrastructure, resource protection and development projects. Projects may include wastewater treatment and related facilities, water supply and related facilities, environmental restoration and surface water protection and development. This assistance is available to non-federal interests in rural Montana, Idaho and Nevada. Design and construction assistance is provided only for projects that are owned by public entities and project costs are shared 75-percent federal contribution and 25-percent non-federal contribution.

1.2 Proposed Action

As discussed in the Preliminary Engineering Report (Triple Tree Eng. 2018a and 2018b), the proposed action consists of two parts, one of which includes a treatment facility to address uranium in excess of the established maximum contaminant level (MCL) which is will referred to as the Uranium Project and another to address tank and distribution system improvements which will referred to as Alternative 5 Project.

The proposed Uranium Project includes the implementation of an Ion Exchange (IX) water treatment system in the new town hall shop. The two existing wells would be used as the water supply. The shop is 38 feet wide by 72 feet long, is currently unused, and has ceilings that are tall enough to house and maintain the treatment equipment. A new partition wall would be constructed separating the west end of the shop area from the rest of the shop. The west end would be used for the treatment facility leaving the remainder of the shop area for other Town uses. Improvements to the existing building would include electrical, HVAC, concrete pipe penetrations, and equipment structural supports. A raw 3,000 feet water pipeline would be

constructed connecting well #1 (Division St Well), well #2 (Firehall Well), and the new treatment facility. The raw water pipeline would pass under the railroad tracks and under state HWY 2. After discussions with Montana Rail Link (MRL) it has been determined that the Town can utilize MRL property for installation of the pipeline. The existing wells would be videoed and cleaned at a minimum. It is expected that both existing wells will need some rehabilitation work and both pumps will need replaced. A treated water pipeline would be constructed between the treatment facility and the distribution system.

The proposed Alternative 5 Project will include recoating the interior of the existing bolted steel tank, replacing the existing 6” asbestos concrete (AC) watermain in Rocky Mountain Drive, and providing a distribution system loop (Figure 1).

1.2.1 Project Location

The proposed project is located in Whitehall, Montana which is in Jefferson County, on Interstate 90, approximately 30 miles southeast of Butte and approximately 60 miles northwest of Bozeman, in Township 1N, Range 4W, Sections 3&4, and the tank is in Township 2N, Range 4W, Section 34. The approximate latitude and longitude of Whitehall is 45°52’12” N and 112°06’ 03” W (Figure 2).



Figure 1 Project Area



Figure 2 Project Vicinity Map

1.3 Purpose and Need for the Proposed Action

The primary purpose of the Uranium Project is to provide clean drinking water to the residents of the Town of Whitehall. Whitehall's drinking water is high in arsenic and uranium to levels above the EPA established MCL. The Town has been in violation of the MCL since 2015 and has entered an Administration Order On Consent (AOC) with the Montana Department of Environmental Quality (DEQ) to address the problem. Failure to meet the conditions of the AOC constitutes a violation of Title 75, chapter 5, part 6, MCA, and may result in the Department seeking a court order requiring additional corrective action and assessing civil penalties. The project will improve the Town of Whitehall's drinking water quality by removing arsenic and uranium. The project is also expected to improve the quality of the storm water runoff to tributaries of the Jefferson River.

The primary purpose of the Alternative 5 Project is to address problems with the existing tank and within the distribution system. In September of 2017, the Town contracted Midco Diving to conduct a tank inspection. The inspection found leaking and interior staining, lifting, corrosion, pitting, and coating failures of the 500,000-gallon existing tank.

According to town officials the AC watermain in Rocky Mountain Drive is the only AC main left in the distribution system. All the other AC mains in town were replaced with the distribution system improvements project that was completed in 1996. The industry standard useful life of AC pipe is approximately 50 years. The AC main in Rocky Mountain Drive was installed in the mid 70's and is at or very near the end of its useful life. It is expected that by eliminating this last piece of AC main from the system, the DEQ required water sample for asbestos will also be eliminated. In addition to the AC pipe there are also problems in Rocky

Mountain Drive with the locations of the curb stops. Many of the curb stops along this main have been installed on private property and in residents' yards which is problematic for public works in the event of a required service shutoff.

Also, the newer commercial area of town that currently includes the Rodeway Inn Motel (formerly Super 8), a Town Pump, several businesses, a few vacant commercial lots, and a few existing residences are all currently fed by a dead-end main. Eliminating the dead-end main will increase the reliability of the water system and improve fire flows in this area.

2.0 ALTERNATIVES TO THE PROPOSED ACTION

The alternatives analyzed in the April 2018 Preliminary Engineering Report (PER), the December 2018 PER Update, and the December 2019 PER Update were as follows:

2.1 Alternative 1 – No Action

This alternative includes taking no action to address the existing problems with the system. The wells would continue to operate as they have in the past by providing water that is in violation of the EPA established MCA for uranium. This alternative would not follow the AOC that the Town has entered into with the DEQ. The AOC requires the system be brought into compliance within the specified timeframe. If no action is taken, the Town will default on its agreement with DEQ potentially resulting in monetary violations. Inaction would result in no change to the operating costs currently experienced by the system until the EPA and DEQ began monetary violations. An EPA non-compliant system is not sustainable

2.2 Alternative 2 - Preferred Alternative

Under this alternative, the proposed Uranium Project will utilize the new town hall shop to house the treatment equipment with the remaining work taking place within the Town of Whitehall incorporated limits in existing streets and through an equipment and material staging area. The proposed Uranium Project includes the implementation of an Ion Exchange (IX) water treatment system in the new town hall shop. The two existing wells would be used as the water supply. The shop is 38 feet wide by 72 feet long, is currently unused, and has ceilings that are tall enough to house and maintain the treatment equipment. A new partition wall would be constructed separating the west end of the shop area from the rest of the building.

The west end would be used for the treatment facility leaving the remainder of the shop area for other Town uses. Improvements to the existing building would include electrical, HVAC, concrete pipe penetrations, and equipment structural supports. A raw 3,000 feet water pipeline would be constructed connecting well #1 (Division St Well), well #2 (Firehall Well), and the new treatment facility. The raw water pipeline would pass under the railroad tracks and under state HWY 2. After discussions with Montana Rail Link (MRL) it has been determined that the Town can utilize MRL property for installation of the pipeline. The existing wells would be videoed and cleaned at a minimum. It is expected that both existing wells will need some

rehabilitation work and both pumps will need replaced. A treated water pipeline would be constructed between the treatment facility and the distribution system.

The Preferred Alternative would include recoating the interior walls, ceiling, floor, and associated appurtenances of the existing 500,000-gallon, bolted steel, ground storage tank. The interior of tank would be sandblasted to an SP-10 “Commercial” blast and the interior walls, ceiling, floor, and associated appurtenances would be coated with 2.5 to 3.5 mils of zinc primer and 12.0 to 16.0 mils of epoxy coat. The improvements would include welding, grinding, and steel repair of those areas that may need structural attention. The tank would be drained and removed from service temporarily during construction.

Temporary provisions would be used to provide pressure to the system. The work would be completed between May and September and during times of lower water demand. All work relating to the tank is expected to be completed, at the latest, by November 30, 2021. Also, approximately 1,500 feet of existing 6” AC watermain in Rocky Mountain Drive would be abandoned in place and new 6” PVC watermain would be installed next to it. The existing fire hydrants and associated auxiliary valves are in good shape; therefore, the fire hydrant leads would be connected to the new PVC watermain. New service lines and curb stops would be provided between the new main and the property line where they would connect to the existing service lines. Rocky Mountain Drive is a paved City street requiring surface restoration to preconstruction conditions.

Additionally, approximately 150 feet of 6” PVC watermain would be installed in the alley south of N Pyfer Street between W Jackson Road and Yellowstone Trail. The additional watermain would add a looping connection to the water system that services the northern area of town currently served with a dead-end watermain. The new watermain would connect to the existing 6” PVC watermain on either end including appropriate valving at each connection.

2.3 Alternatives Eliminated from Further Consideration

The following alternatives were discussed in the PER and eliminated from further consideration after being evaluated for the following criteria: cost-effectiveness, public health and safety, public acceptance, local economic affect, environmental impacts, impacts to existing facilities, reliability, and operational ease.

2.3.1 New Surface Water Source

This alternative would include utilizing the Jefferson River as a surface water source. The new infrastructure would include constructing a surface water intake, a transmission pipeline, and a water treatment plant. Jefferson River surface water rights would need to be established. Land acquisition would be necessary to construct the pipeline between the river and town.

According to the USGS gauging station just upstream of Whitehall at Silver Star the flow rate in the Jefferson River dropped to below 20 cfs during the summer of 2016. According to the Final-Jefferson River Metals Project Area TMDLs and Water Quality Improvements Plan prepared by the DEQ in 2014, the Jefferson River is “classified as chronically dewatered from its headwater

to mouth.” Also, the report classified both Big Pipestone Creek and Jefferson Slough (both enter the Jefferson River at Whitehall) as drinking water impaired because of Arsenic. The Jefferson River also experiences icing conditions during the winter months.

The Jefferson River at Whitehall is not a reliable and usable source to provide consistent quantity and quality of water to Whitehall. The New Surface Water Source Alternative will not be considered further in this report.

2.3.2 New Ground Water Source

This alternative would include finding and developing a new uranium free ground water source near town. The new infrastructure would include drilling and developing new wells, new pumps, power, and a transmission pipeline. Ground water rights would need to be established. Land acquisition would be necessary to drill new wells and to construct the pipeline between the new wells and town.

The town has worked hard to find an alternate ground water source. As suggested in the ground water report, the town plans to take a few more samples this spring once irrigation wells are turned back on. According to the Ground Water Report the three best options for a new ground water source are the North Bench, the Aquifer East of Town, and the Pipestone Creek Aquifer.

The North Bench had the lowest uranium values but still tested positive for uranium in 5 of the 7 samples. The wells on the North Bench only yield between 30 and 100 gpm and the Ground Water Report suggested “yields in the North Bench are questionable”.

In comparison to the North Bench, Higher levels of uranium were detected in the Aquifer East of Town and the Pipestone Creek Aquifer. According to the report the Aquifer East of Town contains substantial volumes of high-yield coarse channelized gravels. The Ground Water Report suggests that higher pumping rates may increase uranium levels and that ground water moving through this coarse material could acquire uranium from the fragmental uranium-rich sediments. New wells on the North Bench, in the Aquifer East of Town, and in the Pipestone Creek Aquifer show low initial uranium levels but once wells are put into regular production it is possible they could begin to show elevated levels of uranium as more ground water is pumped from the aquifers.

Water treatment options considered for the ground water treatment alternatives included Reverse Osmosis, Lime Softening, Coagulation/Filtration, and Ion Exchange (IX) treatments. IX treatment was concluded to be the most cost effective treatment option to mitigate the uranium MCL for the Town of Whitehall.

At this time, there is no clear evidence suggesting that a reliable uranium free groundwater aquifer is available nor clear evidence to support new wells not becoming contaminated with uranium once they are put into regular production. Since we do not have a reliable uranium free groundwater source, the New Ground Water Source Alternative will not be considered further in this report.

2.3.3 IX Treatment Plant at Rec Complex Using Existing Wells

This alternative would include constructing an IX water treatment plant on the Whitehall Recreational Complex property owned by the town of Whitehall located near well #1 (Division St Well). A raw water pipeline would be required between well #2 (Firehall Well) and the new treatment plant. The raw water pipeline would pass under the railroad tracks at two different locations and under state HWY 2. The existing wells would be videoed and cleaned at a minimum. It is expected that both existing wells will need some rehabilitation work and both pumps will need replaced. A treated water pipeline would be constructed between the treatment plant and the distribution system that would also pass under the railroad tracks.

2.3.4 IX Treatment Plant at Rec Complex Using 1 Existing Well and 1 New Well

This alternative would include constructing an IX water treatment plant on the Whitehall Recreational Complex property owned by the town of Whitehall located near well #1 (Division St Well). A new well would be drilled on the rec complex property to replace well #2 (Firehall Well). Well #2 would be disconnected from the system. A raw water pipeline would be required between well #1, the new well, and the new treatment plant. The raw water pipeline would pass under the railroad tracks at one location. The existing well #1 would be videoed and cleaned at a minimum. It is expected that the well will need some rehabilitation work and a new pump. A treated water pipeline would be constructed between the treatment plant and the distribution system that would also pass under the railroad tracks.

2.3.5 IX Treatment Plant in Old Firehall Using Existing Wells

This alternative would include converting the old firehall into an IX water treatment plant. The old firehall is owned by the town and is near well #2 (Firehall Well). A raw water pipeline would be required between well #1 (Division St Well), well #2, and the new treatment plant. The raw water pipeline would pass under the railroad tracks and under state HWY 2. The existing wells would be videoed and cleaned at a minimum. It is expected that both existing wells will need some rehabilitation work and both pumps will need replaced. A treated water pipeline would be constructed between the treatment plant and the distribution system.

2.3.6 IX Treatment Plant at New Town Hall Using 1 Existing Well and 1 New Well

This alternative would include installing an IX water treatment facility in the shop located at the new town hall. One existing well and one new well would be used as the water supply. The shop is 38 feet wide by 72 feet long, is currently unused, and has ceilings that are tall enough to house and maintain the treatment equipment. A new partition wall would be constructed separating the west end of the shop area from the rest of the shop. The west end would be used for the treatment facility leaving the remainder of the shop area for other Town uses. Improvements to the existing building would include electrical, HVAC, concrete pipe penetrations, and equipment structural supports. A new well would be drilled on the Rec Complex property to replace well #2 (Firehall Well). Well #2 would be disconnected from the system and the backup generator would be moved to the new well location. A raw water pipeline would be constructed connecting well #1 (Division St Well), the new well, and the new

treatment facility. The raw water pipeline would pass under the railroad tracks and under state HWY 2. The existing well would be videoed and cleaned at a minimum. It is expected that the existing well will need some rehabilitation work and a new pump. A treated water pipeline would be constructed between the treatment facility and the distribution system.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter presents an analysis of each resource topic that was identified as having a potential to be affected by implementation of the Proposed Action. Each section describes the environmental setting as it relates to that specific resource topic; the direct and indirect effects that could result from implementation of the Proposed Action; and mitigation measures that would avoid, reduce, or compensate for substantial adverse effects of the Proposed Action.

The relevant resources section of this chapter presents the adverse and beneficial environmental effects of the No Action Alternative (Alternative 1) and the action alternatives. The section is organized by resource category, and presents the existing conditions of the resource and effects of each of the alternatives on the resource. Impacts are quantified whenever possible. Qualitative descriptions of impacts are explained by accompanying text where used.

“Significance” has been analyzed in this document in terms of both context (sensitivity) and intensity (magnitude and duration):

- Magnitude
 - No effect – resource not measurably impacted
 - Minor – noticeable impacts to the resource in the project area, but the resource is still mostly functional
 - Moderate – the resource is impaired, so that it cannot function normally
 - Major – the resource is severely impaired so that it is no longer functional in the project area
- Duration
 - Short term – temporary effects caused by the construction and/or implementation of a selected alternative
 - Long term – caused by an alternative after the action has been completed and/or after the action is in full and complete operation

3.1 Environmental Setting

3.1.1 Climate

Whitehall’s climate is drier than the valleys west of the Continental Divide but wetter than the Dry Intermontane Sagebrush Valleys to the southwest. Potential natural vegetation consists of foothills prairie and grama-needlegrass-wheatgrass. Today, cropland, rangeland, and urban-suburban-industrial development occur (Woods et al 2002).

3.1.2 Geology

Whitehall is located in the semiarid, largely treeless Townsend Basin which lies east of the Continental Divide and contains floodplains, stream terraces, alluvial fans, and hills. Geology is primarily composed of Quaternary alluvium and Tertiary valley fill (Woods et al 2002).

3.2 Resources Eliminated From Environmental Consequences Analysis

Aesthetic resources - No aesthetic resources will be impacted as the proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property.

Recreational Resources- No recreational resources will be impacted as the project will be entirely in the town of whitehall incorporated limits.

3.3 Relevant Resources

This section contains a description of relevant resources that could be impacted by the project. The important resources described in this section are those recognized by laws, executive orders, regulations, and other standards of national, state, or regional agencies and organizations; technical or scientific agencies, groups, or individuals; and the general public.

3.3.1 Air Quality

The project area is in attainment with all state air quality standards.

3.3.1.1 Alternative 1 – No Action

Without implementation of the proposed action, there would be no impact on air quality.

3.3.1.2 Alternative 2- Preferred Alternative

With implementation of this alternative, construction activities relating to both the Uranium Project and Alternative 5 will result in temporary dust generation. The effect would be minor and short term. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor would be required to stop work and take appropriate measures to avoid adverse air quality impacts.

3.3.2 Water Quality

The available DEQ records show the wells tested positive for arsenic since at least 2011; although, the running annual average MCL of 0.010 mg/L Arsenic hasn't been exceeded since at least 2011. The wells have also tested high for gross alpha readings, resulting in a running annual average greater than the MCL and gross alpha violations in 2014 and 2015. The Town began

monitoring the wells for uranium in 2015 and has been in violation of the running annual average MCL of 30 mcg/L uranium since 2015.

3.3.2.1 Alternative 1 – No Action

Without implementation of the proposed action, there would be no construction effects on the water quality, however no arsenic and uranium would be removed from the water.

3.3.2.2 Alternative 2 - Preferred Alternative

With implementation of the proposed action, arsenic and uranium will be removed from the Town of Whitehall's source water, tributaries of the Jefferson River, and ultimately the Jefferson River.

The project could have a positive effect on water quality. Whitehall utilizes a lagoon to treat its wastewater (MPDES Permit No. MT0020133). Wastewater is stored in the lagoon during the winter months and is land applied to a farm field adjacent to Big Pipestone Creek and the Jefferson Slough during the growing season. Big Pipestone Creek and Jefferson Slough enter the Jefferson River just downstream of Whitehall.

According to the Final-Jefferson River Metals Project Area TMDLs and Water Quality Improvements Plan prepared by the DEQ in 2014, the Jefferson River, lower Jefferson River, Big Pipestone Creek, and the Jefferson Slough are impaired due to metals. Also, according to the report, because metal concentrations were found to be above the human health target, arsenic will be listed as a cause of impairment to Big Pipestone Creek and Jefferson Slough. The report indicates potential metals sources identified in the Big Pipestone Creek Watershed include the Whitehall WWTP and at low flows elevated arsenic values in the WWTP discharge could be a significant source of loading to Big Pipestone Creek.

The discharge from the Whitehall WWTP is the same water that is pumped from the town's water supply; therefore, is high in arsenic and uranium. Since Whitehall's lagoon land applies the discharge water to property adjacent to Jefferson Slough and Big Pipestone Creek, reducing the amount of arsenic and uranium from the public water supply, as proposed with this project, will remove concentrations of arsenic and uranium from the land adjacent to the Jefferson Slough and Big Pipestone Creek; therefore, improving the quality of the storm water runoff ultimately to the Jefferson River.

According to the Final-Jefferson River Metals Project Area TMDLs and Water Quality Improvements Plan prepared by the DEQ in 2014, "elevated concentrations of metals can impair the support of numerous beneficial uses including: aquatic life, primary contact recreation, drinking water, and agriculture. Within aquatic ecosystems, metals can have a toxic, carcinogenic, or bioconcentrating effect on biota. Likewise, humans and wildlife can suffer acute and chronic effects from consuming water or fish with elevated metals concentrations. Because elevated metals concentrations can be toxic to plants and animals, high metals concentrations in irrigation or stock water may also affect agricultural uses. Although arsenic is

technically a metalloid, it is treated as a metal for TMDL development due to the similarity in sources, environmental effects, and restoration strategies.”

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of water quality concern due to construction activities are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected long-term environmental impacts that would result in a need for mitigation measures.

Prior to construction the contractor would be required to obtain a Storm Water Pollution Prevention Plan (SWPPP) permit to meet storm water requirements including revegetation of any disturbed areas.

3.3.3 Wetlands

No wetlands exist in the project area. The soils map for the area was downloaded from the Natural Resources Conservation Service (NRCS) website. None of the soils in the project area are hydric. The wetland map for the area was downloaded from the US Fish and Wildlife Service's (USFWS) National Wetland Inventory. The wetland map indicates there are no wetlands in the project area. USFWS wetlands map is included in Appendix A.

3.3.3.1 Alternative 1 – No-Action

Without implementation of the proposed action, no sites will be disturbed and no impact on wetlands would occur. Quality of the storm water runoff would not improve, so surrounding wetland could deteriorate.

3.3.3.2 Alternative 2 - Preferred Alternative

USACE was contacted, and comments requested regarding potential project impacts. Under the authority of Section 404 of the Clean Water Act, DA permits are required of the discharge of fill material into waters of the US. Waters of the US include the area below the ordinary high-water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. The project does not include discharge of fill material into waters of the US. The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed and do not contain wetlands. The correspondence from the USACE is included in Appendix C.

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental

concern are encountered during construction the contractor would be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts to wetlands.

3.3.4 Aquatic Resources/Fisheries

Streams near the project site include Big Pipestone Creek, Whitetail Creek, and the Jefferson Slough, all eventually flow into the Jefferson River. These streams provide several miles of riparian corridor in the valley, and have provided popular fishing opportunities. These streams are also important sources of irrigation water. Development within the flood plain of the lower portions of these streams, particularly along Big Pipestone Creek and the Jefferson Slough has had a major effect on the amount of sediment is building up in the stream channels. The result of dewatering, a lack of bank full events, and sediment build up impacts the health of the riparian corridor, wetlands areas, and wildlife populations along these streams, especially the loss of spawning habitat (Jefferson River Watershed Council, 2010).

3.3.4.1 Alternative 1 – No Action

Without implementation of the proposed action, no impact is expected on aquatic resources. However, without the project, no arsenic and uranium would be removed from water that is ultimately used on agriculture and therefore entered into the aquatic ecosystem.

3.3.4.2 Alternative 2 - Preferred Alternative

With implementation of the proposed action, minor and short term impacts from sediment and dust entering the streams and wetlands in the area. Prior to construction the contractor would be required to obtain a SWPPP permit to meet storm water requirements including revegetation of any disturbed areas.

The project could have a positive impact on aquatic resources. Whitehall utilizes a lagoon to treat its wastewater. Wastewater is stored in the lagoon during the winter months and is land applied to a farm field adjacent to Big Pipestone Creek and the Jefferson Slough during the growing season. Big Pipestone Creek and Jefferson Slough enter the Jefferson River just downstream of Whitehall.

3.3.5 Terrestrial Resources

Terrestrial resources in the project area include predominantly urban and disturbed vegetation including roadways and housing.

3.3.5.1 Alternative 1 – No Action

Without implementation of the proposed action, no terrestrial resources would be impacted.

3.3.5.2 Alternative 2 - Preferred Alternative

With implementation of the proposed action, there would be no impact to terrestrial resources as the project area is predominantly urban or industrial disturbed land. The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed.

3.3.6 Wildlife

The Montana Natural Heritage Program (MTNHP), Montana Fish, Wildlife, and Parks (MFWP), and US Fish and Wildlife Services (USFWS) were contacted to identify any potential environmental impacts that might be associated with the projects, and comments requested regarding potential project impacts.

The MTNHP provided an Environmental Summary report summarizing information managed in the MTNHP databases for: species occurrence; other observed species without species occurrences; other species potentially present based on their range, presence of associated habitats, or predictive distribution model output if available; structured surveys (organized efforts following a protocol capable of detecting one or more species); land cover mapped as ecological systems; wetland and riparian mapping; land management categories; and biological reports associated with plant and animal observations.

Wildlife in the vicinity of the proposed action include birds such as the Bald Eagle (*Haliaeetus leucocephalus*), Great Blue Heron (*Ardea Herodias*), Golden Eagle (*Aquila chrysaetos*), Evening Grosbeak (*Coccothraustes vespertinus*), Northern Goshawk (*Accipiter gentilis*), Greater Sage-Grouse (*Centrocercus urophasianus*), Sprague's Pipit (*Anthus spragueii*), Sharp-tailed Grouse (*Tympanuchus phasianellus*), and American White Pelican (*Pelecanus erythrorhynchos*). Mammals include Porcupine (*Erethizon dorsatum*). Insects include the California Darner (*Rhionaeschna californica*) and Familiar Bluet (*Enallagma civile*). Ammhibians include the Northern Leopard Frog (*Lithobates pipiens*).

3.3.6.1 Alternative 1 – No Action

Without implementation of the proposed action, no ground would be disturbed so no effect would be expected to wildlife, however no arsenic and uranium would be removed from the environment.

3.3.6.2 Alternative 2 - Preferred Alternative

The proposed action will have no effect on wildlife in the vicinity, as the project site is all on urban and disturbed areas, where the probablilty of encountering any of these species is very low. The correspondence from the MTNHP and USFWS are included in Appendix C.

The project could have a positive impact on biological resources. Whitehall utilizes a lagoon to treat its wastewater. Wastewater is stored in the lagoon during the winter months and is land

applied to a farm field adjacent to Big Pipestone Creek and the Jefferson Slough during the growing season. Big Pipestone Creek and Jefferson Slough enter the Jefferson River just downstream of Whitehall.

No effect is expected with migratory birds as no trees are to be removed by the project. If trees need to be removed and within the timeframe where migratory birds may be present or nesting, surveys will be conducted by professional and trained individuals. If found, the USFWS would be contacted before any action is taken.

3.3.7 Threatened and Endangered Species

The State and Federal Fish and Wildlife Services were both contacted, and comments requested regarding potential project impacts. MFWP did not respond to our request. Comments from the USFWS were prepared under the authority of, and in accordance with, the provisions of the Endangered Species Act. Endangered species by County was provided from the USFWS and the following species were identified for Jefferson County; Ute Ladies' Tresses, Canada Lynx, Grizzly Bear, Wolverine, and the Whitebark Pine. Although not warranted as an endangered species, the sage grouse was considered for listing under the Endangered Species Act as recently as 2015. The Montana Sage Grouse Habitat Conservation Program does not classify the Town of Whitehall, or any immediate surrounding area to Whitehall, as a sage grouse habitat. The Montana Sage Grouse Habitat Conservation Map is included in Appendix C.

Ute Ladies' Tresses (*Spiranthes diluvialis*) (Threatened)

The orchid occurs along riparian edges, gravel bars, old oxbows, high flow channels, and moist to wet meadows along perennial streams. It typically occurs in stable wetland and seepy areas associated with old landscape features within historical floodplains of major rivers. It also is found in wetland and seepy areas near freshwater lakes or springs (USFWS, 2020).

Canada Lynx (*Lynx canadensis*) (Threatened)

Lynx inhabit boreal forest into subalpine forest along the North Cascade and Rocky Mountain ranges. Lynx are most likely to persist in areas that receive deep snow and have high-density populations of snowshoe hares, the principal prey of lynx (Ruediger et al. 2000).

Grizzly Bear (*Ursus arctos horribilis*) (Threatened)

In Montana, grizzly bears primarily use meadows, seeps, riparian zones, mixed shrub fields, closed timber, open timber, sidehill parks, snow chutes, and alpine slabrock habitats (USFWS 2018).

Wolverine (*Gulo gulo luscus*) (Proposed)

Wolverines inhabit high-elevation alpine portions of Montana. They prefer areas that are cold and receive enough winter precipitation to reliably maintain deep persistent snow late into the warm season. In the southern portion of the species' range where ambient temperatures are warmest, wolverine distribution is restricted to high elevations.

Whitebark Pine (Candidate)

Whitebark pine is typically found in cold, windy, high elevation or high latitude sites in western North America and as a result, many stands are geographically isolated. It is a stress-tolerant pine and its hardiness allows it to grow where other conifer species cannot.

3.3.7.1 Alternative 1 – No Action

Without implementation of the proposed action, no ground disturbance or noise and human activity disturbance would occur that would affect threatened, endangered, or candidate species.

3.3.7.2 Alternative 2 - Preferred Alternative

Ute Ladies' Tresses

Ute Ladies' Tresses utilizes stable wetland and seepy areas associated with old landscape features within historical floodplains of major river. Due to the project site being disturbed and urban landscape, a no effect determination has been made.

Canada lynx

Because the preferred habitat for lynx are not found near the project area and it is unlikely that lynx use or pass through the project area, a no effect determination has been made.

Grizzly bear

It is anticipated the presence of human activity and disturbed nature of the sites would decrease the likelihood of grizzly bears, thus a no effect determination has been made. .

North American wolverine

Based on the urbanized setting, a no effect determination has been made for the wolverine as it is unlikely that wolverine use or pass through the project area.

Whitebark Pine

Whitebark Pine is limited to high elevations, and the project site is situated in lower elevations. No whitebark pine are within or adjacent to the project area, thus a no effect determination has been made.

3.3.8 Cultural Resources

The Montana State Historic Preservation Office (SHPO) was contacted, and comments requested regarding potential project impacts to cultural resources. SHPO conducted a cultural resource file search for the affected area within the preferred alternative.

3.3.8.1 Alternative 1 – No Action

Without implementation of the proposed action, no impact is expected on cultural resources.

3.3.8.2 Alternative 2 - Preferred Alternative

According to SHPO's records "there have been a few previously recorded sites within the designated search locale. In addition to the sites there have been a few previously conducted cultural resource inventories done in the areas." Also, according to SHPO, "If any structures are to be altered and are over fifty years old, we would recommend that they be recorded, and a determination of their eligibility be made. Based on previous disturbances in the proposed project area we feel that a recommendation for a cultural resource inventory is unwarranted at this time." The list of the sites, the previously conducted cultural resource inventories, and the correspondence from SHPO is included in Appendix C.

3.3.9 Soils

According to the NRCS Soil Data Access (SDA) Prime and other Important Farmlands for Jefferson County Area and Part of Silver Bow County, Montana the above-mentioned soils are designated as follows:

- 324A – Fairway clay loam – Prime farmland if irrigated
- 326A – Fairway-Moltoner complex – Farmland of Local Importance
- 401A – Moltoner silty clay loam – Not Prime Farmland

3.3.9.1 Alternative 1 – No Action

Without implementation of the proposed action, no soil would be disturbed and no effect on soils would be expected.

3.3.9.2 Alternative 2 - Preferred Alternative

The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed. The proposed project is not expected to adversely impact existing farmlands.

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity.

3.3.10 Noise

Noise in the area is produced from traffic and farming operations. Within the project area, the acoustic environment consists of mostly flat open space covered by vegetation.

3.3.10.1 Alternative 1 - No-Action

Without implementation of the proposed action, no adverse impacts to the existing noise condition would occur.

3.3.10.2 Alternative 2 - Uranium Project and Alternative 5 (Preferred Alternative)

The proposed improvements would be constructed within the Town of Whitehall incorporated limits. Noise emission levels at the project site would increase above current levels temporarily due to construction; however, appropriate measures would be taken to keep the noise level within compliance levels. No effect is expected.

3.3.11 Socioeconomics and Environmental Justice

According to data from the 2010 US Census conducted by the US Census Bureau, the population of the Town of Whitehall is 1,038 with 473 total households. 72.77% of the Whitehall community is considered at low- and moderate-income level (LMI)..

3.3.11.1 Alternative 1 - No-Action

Without implementation of the proposed action, no socioeconomic impacts would be expected. The existing water system will continue to fail to meet drinking water standards and not provide safe drinking water for the residents of the Town.

3.3.11.2 Alternative 2 - Preferred Alternative

Should the Preferred Alternative be implemented, long-term beneficial impacts to the socioeconomic condition of Whitehall would occur as the proposed project would bring the Town's drinking water to standard. With implementation of the proposed action, construction activities would be completed during times of lower water demand and are anticipated to be completed, at the latest, by November 30, 2021.

The existing water system does not meet drinking water standards set by the EPA and therefore does not provide safe drinking water for the residents of the Town. The proposed project is to improve the entire water system. The proposed improvements will bring the water system into compliance with EPA standards providing safe drinking water to the entire population of the Town of Whitehall. The impacts of the project will result in a safe source of water to be utilized by the residents of the Town of Whitehall.

4.0 CUMULATIVE IMPACTS

The Council on Environmental Quality's (CEQ) regulations (40 CFR 1500-1508) implementing the procedural provisions of the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. 4321 et seq.) define cumulative effects as "the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions (40 CFR 1508.7)". Cumulative Effects can result from individually minor but collectively significant actions taking place over a period of time."

The primary purpose of the Uranium Project is to provide clean drinking water to the residents of the Town of Whitehall. Whitehall's drinking water is high in arsenic and uranium to levels above the EPA established MCL. The Town has been in violation of the MCL since 2015 and has entered an AOC with the DEQ to address the problem. Failure to meet the conditions of the AOC constitutes a violation of Title 75, chapter 5, part 6, MCA, and may result in the Department seeking a court order requiring additional corrective action and assessing civil penalties. The Uranium Project will improve the Town of Whitehall's drinking water quality by removing arsenic and uranium. The project will also improve the quality of the storm water runoff to tributaries of the Jefferson River.

The primary purpose of the Alternative 5 Project is to address problems with the existing tank and within the distribution system. In September of 2017, the Town contracted Midco Diving to conduct a tank inspection. The inspection found leaking and interior staining, lifting, corrosion, pitting, and coating failures of the 500,000-gallon existing tank. The tank is a critical component of the system that provides both pressure and storage which are critical to the public health and safety, especially in the event of a fire. Asbestos is harmful to public health and safety; therefore, eliminating it from the system, via the new 6" PVC watermain in Rocky Mountain Drive, has obvious public health and safety benefits. Looping the dead-end watermain not only allows redundancy in the distribution system limiting water outages to the area but also eliminates locations in the system for water to become stagnant resulting in a public health and safety concern. Eliminating the dead-end main will increase the reliability of the water system and improve fire flows in the newer commercial area of town that includes a Hotel, a Town Pump, several businesses, and a few existing residences which are all currently fed by a dead-end main.

No past, present, and/or future projects that could add to the impact of this project are known at this time.

5.0 COORDINATION

See Appendices

6.0 COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

Archeological Resources Protection Act, 16 U.S.C. 470, et seq.

In compliance. Based on previous disturbances in the proposed project area, MT SHPO stated a recommendation for a cultural resource inventory is unwarranted at this time. The list of the sites, previously conducted cultural resource inventories, and correspondence from SHPO is included in Appendix C. In the event of an unanticipated discovery of cultural resources, work would be halted immediately and a district archeologist would be notified. The work would not continue until the area is inspected by a staff archeologist. If he or she determines that the discovery requires further consultation, the appropriate State Historic Preservation Office would be notified.

Farmland Protection Policy Act, 7 U.S.C. 4201, et. seq.

Not applicable. Project site in urban area only.

Protection & Enhancement of the Cultural Environment (Executive Order 11593)

In compliance. Based on previous disturbances in the proposed project area, MT stated that a recommendation for a cultural resource inventory is unwarranted at this time. The list of the sites, previously conducted cultural resource inventories, and correspondence from SHPO is included in Appendix C. In the event of an unanticipated discovery of cultural resources, work would be halted immediately and a district archeologist would be notified. The work would not continue until the area is inspected by a staff archeologist. If he or she determines that the discovery requires further consultation, the appropriate State Historic Preservation Office would be notified.

Floodplain Management (Executive Order 11988)

Not applicable. Project site is not in designated floodplain.

EO Invasive Species (Executive Order 13122)

In compliance. Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity to insure proper measures are in place to limit invasive species.

Bald and Golden Eagle Protection Act, 16 U.S.C. Sec. 668, 668 note, 669a-668d.

In compliance. This Act prohibits the taking or possession of and commerce in bald and golden eagles, with limited exceptions for the scientific or exhibition purposes, for religious purposes of Indian tribes, or for the protection of wildlife, agriculture or preservation of the species. The proposed project would have no adverse effects on the bald eagle. Surveys would be conducted to ensure no active nests are located within the project site. If an active nest is located within 660 feet of the proposed project site, USFWS and MGFP would be contacted on how to proceed.

Clean Air Act, as amended, 42 U.S.C. 1857h-7, et seq.

In compliance. The purpose of this Act is to protect public health and welfare by the control of air pollution at its source and to set forth primary and secondary National Ambient Air Quality Standards to establish criteria for states to attain, or maintain. Some temporary emissions may occur during ground disturbing activities; however, air quality is not expected to be significantly impacted to any measurable degree by the action.

Clean Water Act, as amended, (Federal Water Pollution Control Act) 33 U.S.C. 1251, et seq.

In compliance. The objective of this Act is to restore and maintain the chemical, physical and biological integrity of the Nation's waters (33 U.S.C. 1251). No wetlands exist within the project site and no section 404 permit is necessary. See correspondence with USACE regulatory in Appendix C.

Endangered Species Act, as amended, 16 U.S.C. 1531, et seq.

In compliance. The State and Federal Fish and Wildlife Services were both contacted, and comments requested regarding potential project impacts. A list of endangered species by County were provided by the USFWS. A no effect determination was made for all species. An email was sent to USFWS on 7/14/2020 detailing the no effects calls made.

Environmental Justice (E.O. 12898)

In compliance. Federal agencies shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States. The project does not disproportionately impact minority or low-income populations, as the project provides a long term, beneficial impact and all of the residents of the Town of Whitehall will have access to the safe water.

Fish and Wildlife Coordination Act, as amended, 16 U.S.C. 661, et seq.

In compliance. An email was sent to the Service detailing the no effect calls, and asking for any further agency comments or questions. No more comments were received.

Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712) as amended.

In compliance. The Migratory Bird Treaty Act (MBTA) of 1918 is the domestic law that affirms, or implements, the United States' commitment to four international conventions with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possessing, transporting, and importing of migratory birds, their eggs, parts, and nests. The take of all migratory birds is governed by the MBTA's regulation of taking migratory birds for educational, scientific, and recreational purposes and requiring harvest to be limited to levels that prevent over-utilization. Executive Order 13186 (2001) directs executive agencies to take certain actions to implement the Act. No adverse impacts are expected with migratory birds as no trees would be removed by the project.

National Environmental Policy Act, as amended, 42 U.S.C. 4321, et seq.

In compliance. In accordance with the National Environmental Policy Act and implementing regulations. Public review was coordinated and after 30 days no comments were received. A Finding of No Significant Impact (FONSI) has been prepared for the proposed action. An Environmental Impact Statement (EIS) is not required.

National Historic Preservation Act, as amended, 16 U.S.C. 470a, et seq.

In compliance.

Based on previous disturbances in the proposed project area, MT SHPO stated a recommendation for a cultural resource inventory is unwarranted at this time. The list of the sites, previously conducted cultural resource inventories, and correspondence from SHPO is included in Appendix C. In the event of an unanticipated discovery of cultural resources, work would be halted immediately and a district archeologist would be notified. The work would not continue until the area is inspected by a staff archeologist. If he or she determines that the discovery requires further consultation, the appropriate State Historic Preservation Office would be notified.

Noise Control Act of 1972, 42 U.S.C. Sec. 4901 to 4918.

In compliance. Noise emission levels at the project site would increase above current levels temporarily due to construction; however, appropriate measures would be taken to keep the noise level within compliance levels.

Protection of Wetlands (E.O. 11990).

Not applicable. No wetlands are within or adjacent to the project area. .

7.0 PREPARER

This EA was prepared by the U.S. Army Corps of Engineers Omaha District; PM-AC, 1616 Capitol Avenue, Omaha, Nebraska for the City of Whitehall, MT. In accordance with 40 CFR § 1506.3, the Corps will adopt this document and prepare a Finding of No Significant Impact.



Signature - Preparer

8/24/2020

Date

8/24/2020

Signature - Supervisor

Date

8.0 LITERATURE CITED

Jefferson River Watershed Council, 2010. Watershed Restoration Plan. Found at http://jeffersonriverwc.com/fish/uploads/2016/06/JRWC_Watershed_Plan.pdf

Ruediger, B. e. a., 2000. Canada lynx conservation assessment and strategy, 2nd Edition, Missoula, Montana: USDA Forest Service, US Fish and Wildlife Service, US Bureau of Land Management, and US National Park Service.

Triple Tree Engineering Inc. 2018a. Preliminary Engineering Report. Whitehall Water System PER. May.

Triple Tree Engineering Inc. 2018b. Preliminary Engineering Report Update. Whitehall Water System PER. December.

Woods, Alan J., Omernik, James, M., Nesser, John A., Sheldon, J., Comstock, J.A., Azevedo, Sandra H., 2002, Ecoregions of Montana, 2nd edition.

US Fish and Wildlife Service, 2018. Grizzly Bear Recovery Zones, Distributions, and Distinct Population Segments, s.l.: US Fish and Wildlife Service.

USFWS. 2020. Ute-ladies'-tresses orchid (*Spiranthes diluvialis*). <https://www.fws.gov/mountain-prairie/es/uteLadiestress.php>.

APPENDIX A

AGENCY CORRESPONDENCE AND INFORMATION

TRIPLE TREE ENGINEERING



March 19, 2018

Department of Environmental Quality
Permitting and Compliance Division
1520 E. 6th Ave.
PO Box 200901
Helena, MT 59620-0901

RE: Whitehall Water Treatment Plant Request for Comment

To Whom It May Concern:

Early in 2017 Whitehall entered into an Administration Order On Consent (AOC) to address water system uranium maximum contaminant level (MCL) violations. The town has been in violation since 2015 when they were ordered to begin uranium monitoring. Included in the AOC are several steps to address the violation. One step includes preparation of a preliminary engineering report (PER).

The Town of Whitehall obtained Triple Tree Engineering to complete the PER. The PER documents the study, conclusions, and recommendations for the Town's water system facilities. The PER evaluates the existing system and establishes and prioritizes recommended courses of action and funding strategies for water improvements.

The selected alternative from the PER includes the construction of a uranium treatment plant and drilling and developing a new source water well at the Town owned recreation complex.

The areas for the potential improvements are identified on the attached schematic.

We are contacting your agency to identify any potential environmental impacts associated with the potential improvements. Please take a few moments to review the potential improvements and provide a written response detailing any potential environmental impacts. If we do not receive comments from your agency within 30 days, we will assume that you have no concerns at this time regarding the proposed improvements. If you have questions or comments, please contact me at 406-461-2115 or jcrawford@tripletreemt.com.

Thank You!

Sincerely,

Triple Tree Engineering, Inc.

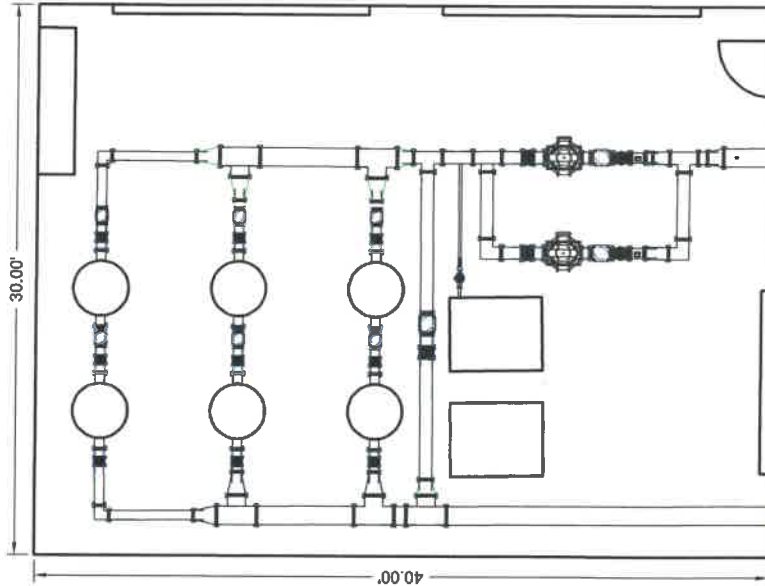

Jason Crawford, PE

3102 Old Broadwater Lane // Helena, MT 59601 // 406.461.0692
www.tripletreemt.com

ALTERNATE 4B
IX WTP AT REC COMPLEX
USING 1 EXISTING WELL
AND 1 NEW WELL
WHITEHALL, MT

17-001
MARCH 5, 2018

IX PLANT LAYOUT



LEGEND	
EXISTING PIPE	
---	4" CAST IRON
---	4" PVC
---	6" ASBESTOS CONCRETE
---	6" CAST IRON
---	6" PVC
---	8" CAST IRON
---	8" PVC
---	12" PVC
PROPOSED PIPE	
---	6" RAW WATER MAIN
---	12" RAW WATER MAIN
---	12" TREATED WATER MAIN



TRIPLE TREE ENGINEERING



March 19, 2018

Department of Fish, Wildlife and Parks
1420 E. 6th Ave.
Helena, MT 59620

RE: Whitehall Water Treatment Plant Request for Comment

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The Town of Whitehall obtained Triple Tree Engineering to complete the PER. The PER documents the study, conclusions, and recommendations for the Town's water system facilities. The PER evaluates the existing system and establishes and prioritizes recommended courses of action and funding strategies for water improvements.

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.


Jason Crawford, PE

TRIPLE TREE ENGINEERING



March 19, 2018

Department of Natural Resources and Conservation
1625 11th Ave.
PO Box 201601
Helena, MT 59620-1601

RE: Whitehall Water Treatment Plant Request for Comment

To Whom It May Concern:

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.

Jason Crawford, PE



United States Department of the Interior

Fish and Wildlife Service

Ecological Services

Montana Field Office

585 Shepard Way, Suite 1

Helena, Montana 59601-6287

Phone: (406) 449-5225, Fax: (406) 449-5339



ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES MONTANA COUNTIES* Endangered Species Act

November 17, 2017

C = Candidate

LT = Listed Threatened

LE = Listed Endangered

P = Proposed

PCH = Proposed Critical Habitat

CH = Designated Critical Habitat

XN = Experimental non-essential population

*Note: Generally, this list identifies the counties where one would reasonably expect the species to occur, not necessarily every county where the species is listed

County/Scientific Name	Common Name	Status
BEAVERHEAD		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
BIG HORN		
<i>Mustela nigripes</i>	Black-footed Ferret	LE
BLAINE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Mustela nigripes</i>	Black-footed Ferret	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
BROADWATER		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
CARBON		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Zapada glacier</i>	Western Glacier Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
CARTER		
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
CASCADE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
CHOUTEAU		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
CUSTER		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
DANIELS		
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
DAWSON		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
DEER LODGE		
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
FALLON		
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
FERGUS		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
FLATHEAD		
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Lednia tumana</i>	Meltwater Lednian Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
GALLATIN		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
GARFIELD		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
GLACIER		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Lednia tumana</i>	Meltwater Lednian Stonefly	P
<i>Zapada glacier</i>	Western Glacier Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
GOLDEN VALLEY		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C
GRANITE		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
HILL		
JEFFERSON		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
JUDITH BASIN		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
LAKE		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Howellia aquatilis</i>	Water Howellia	LT
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Lednia tumana</i>	Meltwater Lednian Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
LEWIS AND CLARK		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
LIBERTY		
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C
LINCOLN		
<i>Acipenser transmontanus</i>	White Sturgeon (Kootenai River Pop.)	LE
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
MADISON		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
McCONE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
MEAGHER		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
MINERAL		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
MISSOULA		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Howellia aquatilis</i>	Water Howellia	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
MUSSELSHELL		
PARK		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
PETROLEUM		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
PHILLIPS		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Mustela nigripes</i>	Black-footed Ferret	LE, XN
<i>Grus americana</i>	Whooping Crane	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
PONDERA		
<i>Charadrius melodus</i>	Piping Plover	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
POWDER RIVER		
<i>Grus americana</i>	Whooping Crane	LE
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
POWELL		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
PRAIRIE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH

County/Scientific Name	Common Name	Status
RAVALLI		
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
RICHLAND		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
ROOSEVELT		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
ROSEBUD		
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Grus americana</i>	Whooping Crane	LE
SANDERS		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
SHERIDAN		
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Grus americana</i>	Whooping Crane	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
SILVER BOW		
<i>Salvelinus confluentus</i>	Bull Trout	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
STILLWATER		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
SWEET GRASS		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
TETON		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
TOOLE		
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C
TREASURE		
No listings at this time		
VALLEY		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
WHEATLAND		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
WIBAUX		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
<i>Charadrius melodus</i>	Piping Plover	LT
YELLOWSTONE		
<i>Grus americana</i>	Whooping Crane	LE
<i>Calidris canutus rufa</i>	Red Knot	LT

TRIPLE TREE ENGINEERING



March 19, 2018

US Army Corps of Engineers
10 West 15th Street, Suite 2200
Helena, MT 59626

RE: Whitehall Water Treatment Plant Request for Comment

To Whom It May Concern:

Early in 2017 Whitehall entered into an Administration Order On Consent (AOC) to address water system uranium maximum contaminant level (MCL) violations. The town has been in violation since 2015 when they were ordered to begin uranium monitoring. Included in the AOC are several steps to address the violation. One step includes preparation of a preliminary engineering report (PER).

The Town of Whitehall obtained Triple Tree Engineering to complete the PER. The PER documents the study, conclusions, and recommendations for the Town's water system facilities. The PER evaluates the existing system and establishes and prioritizes recommended courses of action and funding strategies for water improvements.

The selected alternative from the PER includes the construction of a uranium treatment plant and drilling and developing a new source water well at the Town owned recreation complex.

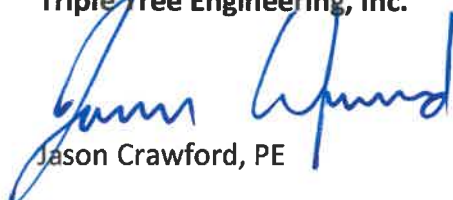
The areas for the potential improvements are identified on the attached schematic.

We are contacting your agency to identify any potential environmental impacts associated with the potential improvements. Please take a few moments to review the potential improvements and provide a written response detailing any potential environmental impacts. If we do not receive comments from your agency within 30 days, we will assume that you have no concerns at this time regarding the proposed improvements. If you have questions or comments, please contact me at 406-461-2115 or jcrawford@tripletreemt.com.

Thank You!

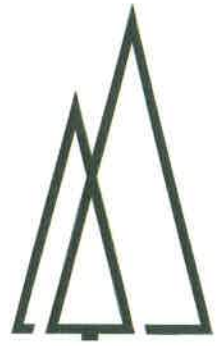
Sincerely,

Triple Tree Engineering, Inc.



Jason Crawford, PE

TRIPLE TREE ENGINEERING



March 19, 2018

U.S. Fish and Wildlife Service
Ecological Services
585 Shepherd Way
Helena, MT 59601

RE: Whitehall Water Treatment Plant Request for Comment

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.

Jason Crawford, PE

TRIPLE TREE ENGINEERING



March 19, 2018

Montana Natural Heritage Program
1515 East 6th Avenue, Box 201800
Helena, MT 59620-1800

RE: Whitehall Water Treatment Plant Request for Comment

To Whom It May Concern:

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.

Jason Crawford, PE



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
HELENA REGULATORY OFFICE
10 WEST 15TH STREET, SUITE 2200
HELENA, MONTANA 59626

March 26, 2018

Regulatory Branch
Montana State Program
Corps No. **NWO-2018-00555**

Subject: City of Whitehall (Triple Tree Engineering) - Water System Uranium Contamination Cleanup - Big Pipestone Creek - (Jefferson County)

Jason Crawford
Triple Tree Engineering
3102 Old Broadwater Lane
Helena, Montana 59601

Dear Mr. Crawford:

We are responding to your request for Department of Army comment regarding the above-referenced project. Specifically, you are proposing to construct a uranium treatment plant and drilling and developing a new source water well at the town owned recreation complex. The project is located at Latitude 45.870157°, Longitude -112.100114°, within Section 4, Township 1 N, Range 4 W, Principal Meridian, Jefferson County, Montana.

The mission of the U.S. Army Corps of Engineers (Corps) Regulatory Program is to protect the Nation's aquatic resources while allowing reasonable development through fair, flexible and balanced permit decisions. In particular, under Section 404 of the Clean Water Act, we work to protect the biological, physical, and chemical integrity of the Nation's aquatic resources. Projects are evaluated on a case-by-case basis to determine the potential benefits and detriments that may occur as a result of the proposal. In all cases an applicant must avoid and minimize impacts to aquatic resources to the greatest extent practicable.

Under the authority of Section 404 of the Clean Water Act (CWA), DA permits are required for the discharge of fill material into waters of the U.S. Waters of the U.S. include the area below the ordinary high water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. Isolated waters and wetlands, as well as man-made channels, may be waters of the U.S. in certain circumstances, which must be determined on a case-by-case basis.

Based on the information provided in your submittal, we are unable to ascertain if regulated activities are proposed or if jurisdictional waters of the U.S. are present within the project area. If your final design includes the placement of dredged or fill material in any jurisdictional area described above, or otherwise requires authorization by a DA permit, please submit a permit application to this office prior to starting any work. After a review of the materials submitted we will determine what type of permit, if any, will be required. In order to provide the necessary information you may use the Montana Joint Permit Application Form, found at the following address: <http://www.dnrc.mt.gov/licenses-and-permits/stream-permitting>. If you do not wish to use this form, or do not have internet access please contact our office at the address below to obtain more information.

-2-

Note that this letter is not a DA authorization to proceed. It only informs you of your need to obtain a DA permit if waters of the U.S. will be affected. If waters of the U.S. will not be affected by a jurisdictional activity a DA permit will not be required for the project.

Please refer to identification number NWO-2018-00555 in any correspondence concerning this project. If you have any questions, please contact Jade Clabaugh at 10 W 15th Street, Suite 2200, Helena, MT, 59626, by email at Jade.M.Clabaugh@usace.army.mil, or telephone at (406) 441-1365.

Sincerely,
CLABAUGH.JAD
E.METZLER.153
5431252

Digitally signed by
CLABAUGH.JADE.METZLER.1535431252
DN: c=US, o=U.S. Government, ou=DoD,
ou=PKI, ou=USA,
cn=CLABAUGH.JADE.METZLER.15354312
52
Date: 2018.03.26 11:39:41 -06'00'

Jade M. Clabaugh
Regulatory Project Manager



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Montana Ecological Services Office
585 Shephard Way, Suite 1
Helena, Montana 59601-6287

In Reply Refer To:
M.29 Public (I)
06E11000-2018-TA-
0305
06E11000-2018-
CPA-0066

March 29, 2018

Jason Crawford, P.E.
Triple Tree Engineering
3102 Old Broadwater Lane
Helena, Montana 59601

Dear Mr. Crawford:

Thank you for your letter dated March 19, 2018, requesting U.S. Fish and Wildlife Service (Service) comment on the Town of Whitehall Water Treatment Plant project. The proposed project will address water system uranium maximum contaminant level violations. The proposed project will consist of constructing a uranium treatment plant and drilling and developing a new source water well at the Town-owned recreation complex. The proposed project will be located within the City of Whitehall, Jefferson County, Montana. Your letter and a map of the proposed project area were received by our office on March 21, 2018.

Our comments are prepared under the authority of, and in accordance with, the provisions of the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.), Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, 54 Stat. 250), and the Endangered Species Act (16 U.S.C. 1531 et. seq.). Our comments do not address the overall environmental acceptability of the proposed action. We offer the following comments for your consideration.

Migratory Bird Treaty Act

We have reviewed the provided information on the proposed project and have determined that there could be potential effects to migratory birds. The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, and transportation, (among other actions) of migratory birds, their eggs, parts, and nests, except when specifically permitted. To the extent practicable, necessary vegetation clearing, grubbing, and filling construction activities should be scheduled so as to avoid and minimize impacts to nesting birds, if present in the project area. If work is proposed to take place in migratory bird habitats that may result in take of migratory birds, their eggs, or active nests, the Service recommends that the project proponent take all practicable measures to avoid and minimize take, such as maintaining adequate buffers, to protect the birds until the young have fledged. Active nests may not be removed. The Service has developed, and continues to revise and develop, general and industry-specific conservation measures for avoiding and minimizing impacts to birds (<https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>). We recommend that the proposed

project consider and incorporate these measures into project design, construction, and documentation as appropriate.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) prohibits anyone, without a permit issued by the Secretary of the Interior, from taking bald or golden eagles, including their parts, nests, or eggs. The BGEPA provides criminal and civil penalties for persons who take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof. The BGEPA defines “take” as pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb. “Disturb” means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior. In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagles return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

The Service is not aware of any known bald or golden eagle nests within one mile of the project. If active eagle nests are present within 0.5 mile of the project during construction, we recommend that the proponent comply with seasonal restrictions and construction / development distance buffers specified in the 2010 Montana Bald Eagle Management Guidelines: An Addendum to Montana Bald Eagle Management Plan (1994) in order to avoid/minimize the risk for eagle take.

Threatened and Endangered Species

Based on the proposed location of this proposed project within an existing municipal development setting, we do not anticipate its implementation would result in adverse effects to listed, proposed, or candidate threatened or endangered species, or listed or proposed critical habitat.

Additional Guidance

In addition to coordination with the Service, we recommend coordination with Montana Fish, Wildlife and Parks and the Montana Natural Heritage Program. These agencies may be able to provide updated, site-specific information regarding eagle and other raptor nests, as well as all other fish, wildlife, and sensitive plant resources occurring in the proposed project area. Contact information for these two agencies is below:

Montana Fish, Wildlife and Parks
1420 East Sixth Avenue
P.O. Box 200701
Helena, Montana 59620-0701
Phone: (406) 444-2535

Montana Natural Heritage Program
1515 East 6th Avenue, Box 201800
Helena, Montana 59620-1800
Phone: (406) 444-5354

This project should be re-analyzed if new information reveals effects of the action that may affect listed species or designated or proposed critical habitat (1) in a manner or to an extent not considered in this letter, (2) if the action is subsequently modified in a manner that causes an effect to a listed species or designated or proposed critical habitat that was not considered in this letter, and (3) if a new species is listed or critical habitat is designated that may be affected by this project.

If wetlands are impacted by this proposed project, Corps of Engineers Section 404 permits may be required. The Service suggests any proposed or future project be designed to avoid and minimize impacts to wetland areas, stream channels and surrounding vegetation to the greatest extent possible. Direct, indirect and cumulative impacts, along with future activities required to maintain these improvements, should be analyzed.

Thank you for the opportunity to comment on the Town of Whitehall Water Treatment Plant project. The Service appreciates your efforts to incorporate fish and wildlife resource concerns into your project planning. If you have further questions related to this issue, please do not hesitate to contact Karen Newlon at (406) 449-5225, extension 209.

Sincerely,



for Jodi L. Bush
Office Supervisor

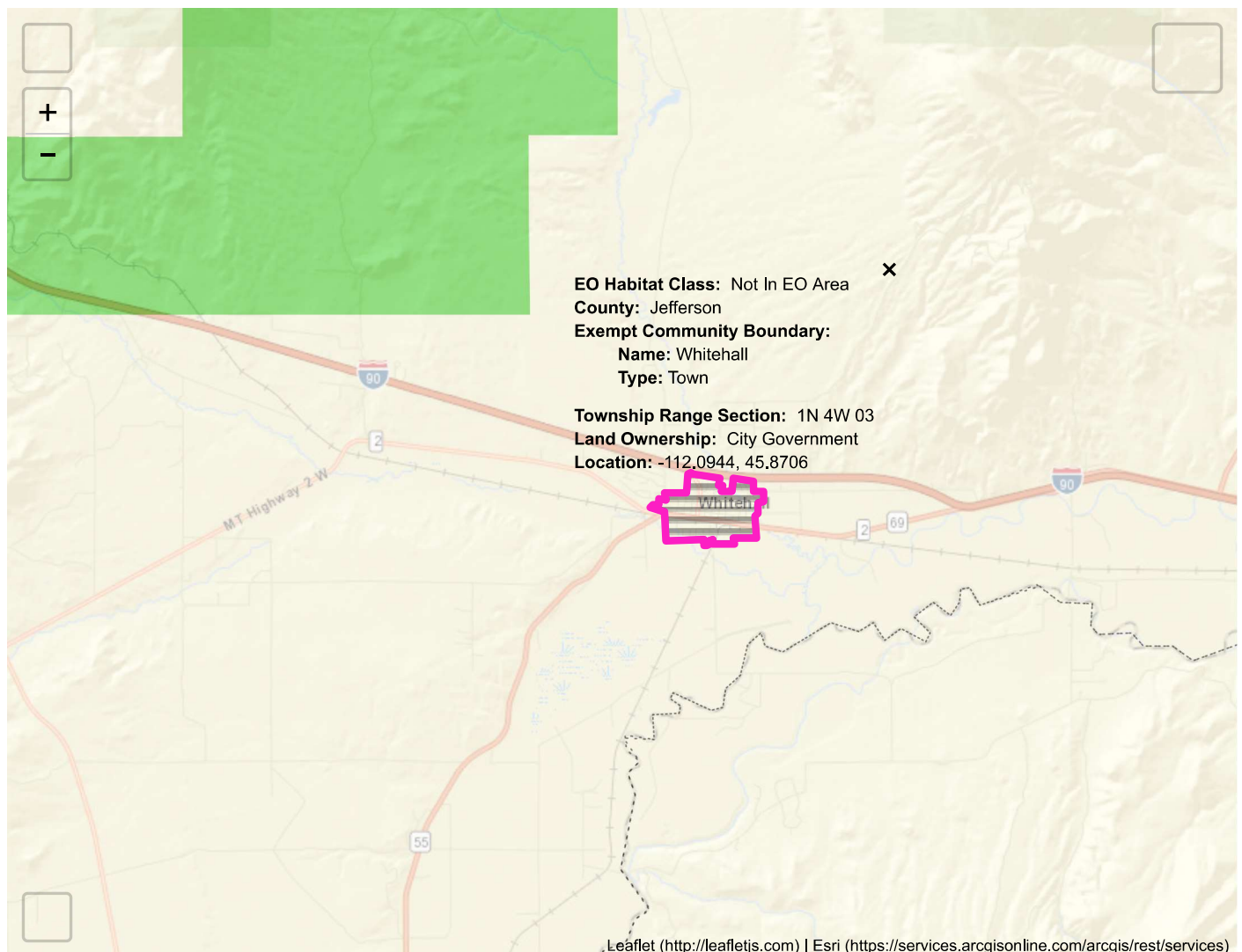
Photo Credit: Richard Prodgers

[Home \(/\)](#) ▶ [Montana Sage Grouse Habitat Conservation Map](#)

Montana Sage Grouse Habitat Conservation Map

Use this map to view and explore types of sage grouse habitat designated as core (blue), general (green), connectivity (light-blue) habitats or BLM priority areas. To zoom into an area, hold the Shift key and draw a rectangle. Anyone proposing new activities in sage grouse habitat must submit a project application (/ProposedProject/Instructions) for consultation.

If your project is close to designated sage grouse habitat or BLM Priority area, or if you are unsure your project is within designated sage grouse habitat or BLM Priority area, please submit your project for review as permitting agencies will be checking to see if your project is located within these designated sage grouse habitats. If your permitting agency requires evidence that your project is outside of designated sage grouse habitat, we recommend that you log in (/saml/login) and start a project application and take a screenshot of your project's location.



TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Lyman Guy
Chairman
PO Box 1330
Anadarko, OK 73005

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Lyman Guy:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *"If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standard (48 FR 22716, Sept.1983)."*

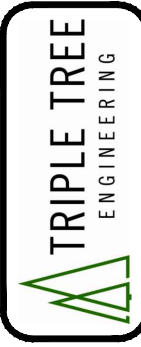
In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Apache Tribe of Oklahoma. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler



REVISIONS	
DATE	DESCRIPTION

WHITEHALL WATER SYSTEM IMPROVEMENTS - PART 1

TOWN OF WHITEHALL
WHITEHALL, MT

URANIUM TREATMENT FACILITY CONNECTIONS

PROJECT #:	18-49
DRAFTED BY:	JRC
CHECKED BY:	JRC
DATE:	12/10/2019
SHEET	
#	



TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Vernon Finley
Chairperson
PO Box 278
Pablo, MT 59855-0278

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Vernon Finley:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *“If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior’s Professional Qualification Standard (48 FR 22716, Sept.1983).”*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the CSKT of the Flathead Reservation. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Mark Azure
President
656 Agency Main Street
Harlem, MT 59526

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Mark Azure:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *"If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standard (48 FR 22716, Sept.1983)."*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.
Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Darrin Old Coyote
Chairperson
PO Box 129
Crow Agency, MT 59022

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Darrin Old Coyote:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *"If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standard (48 FR 22716, Sept.1983)."*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Crow Tribe of Montana. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Blaine Edmo
Tribal Chairman
PO Box 306
Fort Hall, ID 83203

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Blaine Edmo:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *“If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior’s Professional Qualification Standard (48 FR 22716, Sept.1983).”*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Shoshone-Bannock Tribes of the Fort Hall Reservation. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant SHPO Notification Letter

12/13/2019

Damon Murdo
Cultural Resources Manager
PO Box 201201
Helena, MT 59620

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Damon Murdo:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review.

In accordance with this blanket delegation, Town of Whitehall is initiating Section 106 review on behalf of RUS. In delegating this authority, RUS is advocating for the direct interaction between its borrowers and the State Historic Preservation Office (SHPO). RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties earlier in project planning.

TRIPLE TREE ENGINEERING



The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *“If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior’s Professional Qualification Standard (48 FR 22716, Sept.1983).”*

At the direction of RUS, the Town of Whitehall has notified and is seeking information about possibly affected historic properties in the APE from the following Indian tribes – Apache Tribe of Oklahoma, Crow Tribe of Montana, CSKT of the Flathead Reservation, Fort Belknap Indian Community of the Fort Belknap Reservation of Montana, and the Shoshone-Bannock Tribes of the Fort Hall Reservation.

Please review the project and enclosed maps. After completing your review, please provide the Town of Whitehall with your recommendation(s) about whether or not study of the APE is needed to identify affected historic properties. If you recommend study, please explain the nature and scope of the proposed investigation specifically in reference to those factors identified in 36 CFR § 800.4(b)(1).

Submit your recommendations within thirty (30) days of your receipt of this request to Jason Crawford, 406-461-2115 or at jcrawford@tripletreemt.com. If no timely response is received, the Town of Whitehall will notify RUS so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4). Should you have any questions, please contact Jason Crawford at jcawford@tripletreemt.com.

Sincerely,

Jason Crawford, P.E.
Enclosures: Maps

cc: Laura Sattler

Jason Crawford

From: Murdo, Damon <dmurdo@mt.gov>
Sent: Wednesday, December 18, 2019 12:04 PM
To: Jason Crawford
Subject: RE: Whitehall Section 106 SHPO Letter
Attachments: 2019121703.pdf; CRABS.PDF; CRIS.PDF



December 18, 2019

Jason Crawford
Triple Tree Engineering
3102 Old Broadwater Lane
Helena MT 59601

RE: WHITEHALL WATER SYSTEM IMPROVEMENTS. SHPO Project #: 2019121703

Dear Mr. Crawford:

I have conducted a cultural resource file search for the above-cited project located in Sections 3, 4, T10N R3W. According to our records there have been a few previously recorded sites within the designated search locale. In addition to the sites there have been a few previously conducted cultural resource inventories done in the areas. I've attached a list of these sites and reports. If you would like any further information regarding these sites or reports, you may contact me at the number listed below

It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are to be altered and are over fifty years old, we would recommend that they be recorded, and a determination of their eligibility be made.

Based on previous disturbances in the proposed project area we feel that a recommendation for a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or if cultural materials be inadvertently discovered during this project we would ask that our office be contacted, and the site investigated.

If you have any further questions or comments, you may contact me at (406) 444-7767 or by e-mail at dmurdo@mt.gov. I have attached an invoice for the file search. Thank you for consulting with us.

Sincerely,

Damon Murdo
Cultural Records Manager
State Historic Preservation Office

File: USDA/RUS/2019

STATE HISTORIC PRESERVATION OFFICE

Montana Cultural Resource Database

CRABS Township, Range, Section Results

Report Date: 12/18/2019

Township: 1 N Range: 4 W Section: 3

ANDERSON PAUL

2/14/1983 CULTURAL RESOURCE INVENTORY AND EVALUATION: S549-1(1)0 WHITEHALL - SOUTH

CRABS Document Number: JF 4 4226 Agency Document Number: S549-1(1)0

Township: 1 N Range: 4 W Section: 4

ANDERSON PAUL

2/14/1983 CULTURAL RESOURCE INVENTORY AND EVALUATION: S549-1(1)0 WHITEHALL - SOUTH

CRABS Document Number: JF 4 4226 Agency Document Number: S549-1(1)0

Township: 1 N Range: 4 W Section: 4

BECK BARB S.

3/1/1987 CULTURAL RESOURCE RECORDATION AND EVALUATION OF THE JEFFERSON RANGER DISTRICT ADMINISTRATIVE SITES

CRABS Document Number: JF 1 4122 Agency Document Number: 87-DL-2-2

Township: 1 N Range: 4 W Section: 4

CAYWOOD JANENE M., ET AL.

3/11/1991 EVALUATION OF REGION 1 FOREST SERVICE-OWNED BUILDINGS FOR ELIGIBILITY TO THE NATIONAL REGISTER OF HISTORIC PLACES

CRABS Document Number: ZZ 1 13017 Agency Document Number:

Township: 1 N Range: 4 W Section: 3

BRUMLEY JOHN H.

8/1/2000 A CULTURAL RESOURCE INVENTORY OF THE PROPOSED TWIN BRIDGES TO WHITEHALL, MELROSE TO APEX, AND DILLON TO APEX TELEPHONE CABLE ROUTES

CRABS Document Number: MA 6 23097 Agency Document Number: BLM 00-MT-050-31

Township: 1 N Range: 4 W Section: 3

AXLINE JON A.

3/1/2000 INVENTORY AND ASSESSMENT: REINFORCED CONCRETE T-BEAM BRIDGES

CRABS Document Number: ZZ 4 24227 Agency Document Number:

Township: 1 N Range: 4 W Section: 4

FERGUSON DAVID M.

6/5/2002 A CULTURAL RESOURCES INVENTORY OF THE PROPOSED LIBERTY PLACE HEAD TRAUMA FACILITY IN WHITEHALL, JEFFERSON COUNTY MONTANA

CRABS Document Number: JF 6 24838 Agency Document Number:

Township: 1 N Range: 4 W Section: 4

FERGUSON DAVID

5/5/2002 A CULTURAL RESOURCE INVENTORY OF THE PROPOSED LIBERTY PLACE HEAD TRAUMA FACILITY IN WHITEHALL JEFFERSON COUNTY MONTANA

CRABS Document Number: JF 6 24839 Agency Document Number:

Township: 1 N Range: 4 W Section: 3

CAYWOOD JANENE M. AND JESSE ADAMS

12/23/2005 RESULTS OF A CULTURAL RESOURCE INVENTORY OF MONTANA DEPARTMENT OF TRANSPORTATION'S 2001-FENCING EAST OF WHITEHALL SAFETY IMPROVEMENTS PROJECT, JEFFERSON COUNTY, MONTANA

CRABS Document Number: JF 4 28207 Agency Document Number: STPH 69-1(22)1 CONTROL # 5018

Township: 1 N Range: 4 W Section: 4

ROSSILLON MITZI

12/19/2005 A CULTURAL RESOURCE INVENTORY AND SITE EVALUATION OF THE WHITEHALL-SOUTH HIGHWAY IMPROVEMENT IN JEFFERSON, MADISON AND SILVERBOW COUNTIES, MONTANA

CRABS Document Number: ZZ 4 28210 Agency Document Number: STPP 55-1(6)0

Township: 1 N Range: 4 W Section: 4

MCCORMICK MARY E.

10/1/1999 WHITEHALL STREET RECONSTRUCTION PROJECT, WHITEHALL, MONTANA: CULTURAL RESOURCE INVENTORY AND EVALUATION

CRABS Document Number: JF 4 30368 Agency Document Number: STPP 55-3(7)13

Township: 1 N Range: 4 W Section: 4

CHERULLO TAMMY

6/1/2011 JEFFERSON DISTRICT FENCE REPLACEMENT



STATE HISTORIC PRESERVATION OFFICE Montana Cultural Resource Database

CRABS Township, Range, Section Results

Report Date: 12/18/2019

CRABS Document Number: JF 1 32826 Agency Document Number: 11-BD-7-9

Township: 1 N Range: 4 W Section: 4

CHERULLO TAMMY

5/7/2014 WHITEHALL RANGER STATION OFFICE SPACE

CRABS Document Number: JF 1 37255 Agency Document Number: R2014010207007

STATE HISTORIC PRESERVATION OFFICE

Cultural Resource Information Systems

CRIS Township, Range, Section Report

Report Date:12/18/2019

Site #	Twp	Rng	Sec	Qs	Site Type 1	Site Type 2	Time Period	Owner	NR Status
24JF0538	1N	4W	4	NW	Historic Ranger Station		Historic Period	Forest Service	Eligible
24JF0767	1N	4W	3	NE	Historic Vehicular/Foot Bridge		Historic More Than One Decade	MDOT	Undetermined*
24JF0927	1N	4W	4	NW	Historic Irrigation System		Historic More Than One Decade	Private	Ineligible
24JF0927	1N	4W	4	SW	Historic Irrigation System		Historic More Than One Decade	Private	Ineligible
24JF0948	1N	4W	3	comb	Historic Railroad		Historic More Than One Decade	BLM	Eligible
24JF0948	1N	4W	4	comb	Historic Railroad		Historic More Than One Decade	BLM	Eligible
24JF1617	1N	4W	4	NE	Historic Commercial Development		Historic More Than One Decade	Private	Eligible
24JF1618	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1619	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1620	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1621	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1622	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1623	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1624	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1625	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1626	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1627	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1628	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1629	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1630	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1631	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1632	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1633	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1634	1N	4W	4	NE	Historic Political/Government		Historic More Than One Decade	Other	Eligible
24JF1635	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1862	1N	4W	4	NW	Historic Vehicular/Foot Bridge		Historic More Than One Decade	MDOT	Ineligible
24JF0550	1N	4W	4	NE	Historic Hotel/Motel		1910-1919	Private	NR Listed

APPENDIX B

FLOODPLAIN , WETLAND MAPS, IPaC, USFWS Letter





United States Department of the Interior

FISH AND WILDLIFE SERVICE
Montana Ecological Services Field Office
585 Shephard Way, Suite 1
Helena, MT 59601-6287
Phone: (406) 449-5225 Fax: (406) 449-5339



In Reply Refer To:
Consultation Code: 06E11000-2020-SLI-0544
Event Code: 06E11000-2020-E-00884
Project Name: Whitehall 595

July 14, 2020

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
-

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Montana Ecological Services Field Office

585 Shephard Way, Suite 1

Helena, MT 59601-6287

(406) 449-5225

Project Summary

Consultation Code: 06E11000-2020-SLI-0544

Event Code: 06E11000-2020-E-00884

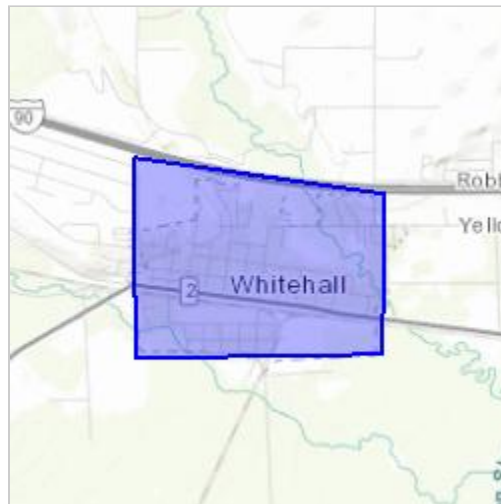
Project Name: Whitehall 595

Project Type: WATER QUALITY MODIFICATION

Project Description: Water Treatment Improvements

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/45.87225879048606N112.09776296650801W>



Counties: Jefferson, MT

Endangered Species Act Species

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Canada Lynx <i>Lynx canadensis</i> Population: Wherever Found in Contiguous U.S. There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3652	Threatened
Grizzly Bear <i>Ursus arctos horribilis</i> Population: U.S.A., conterminous (lower 48) States, except where listed as an experimental population There is proposed critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/7642	Threatened
North American Wolverine <i>Gulo gulo luscus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5123	Proposed Threatened

Flowering Plants

NAME	STATUS
Ute Ladies'-tresses <i>Spiranthes diluvialis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2159	Threatened

07/14/2020

Event Code: 06E11000-2020-E-00884

4

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

From: [Weber, Christopher R CIV USARMY CENWO \(USA\)](#)
To: jodi_bush@fws.gov
Cc: [Jason Crawford](#)
Subject: Whitehall, MT EA
Date: Tuesday, July 14, 2020 1:55:00 PM
Attachments: [Species List_Montana Ecological Services Field Office.pdf](#)
[20200622_ScopeExhibit.jpg](#)

(HTML)

Good Afternoon Jodi,

I am preparing an EA for potential impacts of improvements to the Whitehall Water Treatment Facility, Whitehall, MT. USACE funding is authorized as part of Section 595 of the 1999 Water Resources Development Act, as amended. Section 595 allows for the Corps to provide design and construction assistance for water-related environmental infrastructure, resource protection and development projects. USFWS was first informed about this project by letter from Jason Crawford (Triple Tree Eng.) on March 19, 2018. This email summarizes the effect determinations within the EA. The EA can be made available by request. I have attached IPaC report and project map for your information.

Actions

The proposed action consists of two parts, one of which includes a treatment facility to address excess uranium and another to address tank and distribution system improvements. Whitehall's drinking water is high in arsenic and uranium to levels above the EPA established MCL. An Ion Exchange (IX) water treatment system will be installed in the new town hall shop. The distribution system improvements will include recoating the interior of the existing bolted steel tank, replacing the existing 6" asbestos concrete (AC) watermain, and provide a distribution system loop.

Environmental Impact

An Information for Planning and Consultation (IPaC) letter report was obtained from the internet on July 14, 2020 (consultation code: 06E11000-2020-SLI-0544). The IPaC indicated the potential presence of four threatened or endangered species. These species are the Canada lynx, Grizzly Bear, North American Wolverine, and the Ute Ladies'-tresses. No critical or suitable habitat is within or near the area that will be disturbed during construction. No trees will be removed so no impacts to migratory birds is expected. The project will occur entirely within previously disturbed urbanized surfaces where no lynx, grizzly bear, or wolverine habitat is expected. A no effect determination has been made for each of the four species.

No waters of the United States (i.e. jurisdictional waters) will be impacted within the review area. Therefore, activities within the review area are not subject to Department of the Army regulatory authorities and no permit pursuant to Section 404 of the Clean Water Act is required from the Corps of Engineers.

Please contact me if you wish to discuss the project in further detail or if you have any questions related to your

agency's concerns.

Thanks,

Christopher Weber, PWS

Environmental Resources Specialist

US Army Corps of Engineers, Omaha District

1616 Capitol Avenue

Omaha, NE 68102

Office: 402-995-2694



TRIPLE TREE
ENGINEERING

USDA RD ENVIRONMENTAL REPORT

Whitehall Water System

Whitehall, MT

December 2019



Table of Contents

1	PURPOSE AND NEED FOR THE PROJECT	1
1.1	PROJECT DESCRIPTION	1
1.2	PURPOSE AND NEED	1
2	ALTERNATIVES EVALUATED INCLUDING THE PROPOSED ACTION	2
2.1	PROPOSED ACTION/PREFERRED ALTERNATIVE	2
2.2	OTHER ALTERNATIVES EVALUATED	5
2.2.1	2018 PER.....	5
2.2.2	2018 PER UPDATE.....	5
2.2.3	2019 PER UPDATE.....	5
2.3	NO ACTION ALTERNATIVE	5
3	AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES	6
3.1	LAND USE/LAND OWNERSHIP	6
3.1.1	AFFECTED ENVIRONMENT	6
3.1.2	ENVIRONMENTAL CONSEQUENCES.....	6
3.1.3	MITIGATION.....	7
3.2	FLOODPLAINS	7
3.2.1	AFFECTED ENVIRONMENT	7
3.2.2	ENVIRONMENTAL CONSEQUENCES.....	7
3.2.3	MITIGATION.....	7
3.3	WETLANDS	7
3.3.1	AFFECTED ENVIRONMENT	7
3.3.2	ENVIRONMENTAL CONSEQUENCES.....	8
3.3.3	MITIGATION.....	8
3.4	CULTURAL RESOURCES	8
3.4.1	AFFECTED ENVIRONMENT	8
3.4.2	ENVIRONMENTAL CONSEQUENCES.....	8
3.4.3	MITIGATION.....	9
3.5	BIOLOGICAL RESOURCES	9
3.5.1	GENERAL FISH, WILDLIFE AND VEGETATION	9
3.5.1.1	AFFECTED ENVIRONMENT.....	9
3.5.1.2	ENVIRONMENTAL CONSEQUENCES	9
3.5.1.3	MITIGATION	10
3.5.2	LISTED THREATENED AND ENDANGERED SPECIES	11
3.5.2.1	AFFECTED ENVIRONMENT.....	11
3.5.2.2	ENVIRONMENTAL CONSEQUENCES	11
3.5.2.3	MITIGATION	11
3.5.3	MIGRATORY BIRD TREATY ACT	11
3.5.3.1	AFFECTED ENVIRONMENT.....	11
3.5.3.2	ENVIRONMENTAL CONSEQUENCES	12
3.5.3.3	MITIGATION	12
3.5.4	BALD AND GOLDEN EAGLE PROTECTION ACT	12
3.5.4.1	AFFECTED ENVIRONMENT.....	12
3.5.4.2	ENVIRONMENTAL CONSEQUENCES	12
3.5.4.3	MITIGATION	13
3.5.5	INVASIVE SPECIES	13



3.5.5.1	AFFECTED ENVIRONMENT.....	13
3.5.5.2	ENVIRONMENTAL CONSEQUENCES	13
3.5.5.3	MITIGATION	13
3.6	WATER RESOURCES.....	13
3.6.1	WATER QUANTITY.....	13
3.6.1.1	AFFECTED ENVIRONMENT.....	13
3.6.1.2	ENVIRONMENTAL CONSEQUENCES	14
3.6.1.3	MITIGATION	15
3.6.2	WATER QUALITY.....	15
3.6.2.1	AFFECTED ENVIRONMENT.....	15
3.6.2.2	ENVIRONMENTAL CONSEQUENCES	16
3.6.2.3	MITIGATION	17
3.7	SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE	18
3.7.1	AFFECTED ENVIRONMENT	18
3.7.2	ENVIRONMENTAL CONSEQUENCES.....	18
3.7.3	MITIGATION.....	21
3.8	MISCELLANEOUS ENVIRONMENT/ENVIRONMENTAL CONSEQUENCES	21
3.8.1	AFFECTED ENVIRONMENT	21
3.8.2	ENVIRONMENTAL CONSEQUENCES.....	22
3.8.3	MITIGATION.....	22
4	CUMULATIVE EFFECTS	23
5	SUMMARY OF MITIGATION	23
6	COORDINATION, CONSULTATION AND CORRESPONDENCE.....	24
7	REFERENCES	25
8	LIST OF PREPARERS	25

List of Tables & Figures

FIGURE 1: URANIUM PROJECT	3
FIGURE 2: ALTERNATIVE 5 PLAN.....	4
TABLE 1: SUMMARY OF RECENT DEQ CORRESPONDENCE	16
TABLE 2: TOTAL PROJECT COST ESTIMATE.....	19
TABLE 3: SUMMARY OF USER FEES	21

List of Appendices

- Appendix A – Soils and Land Information
- Appendix B – Previous Environmental Evaluations
- Appendix C – Agency Correspondence and Information
- Appendix D – Floodplain and Wetland Maps



1 PURPOSE AND NEED FOR THE PROJECT

1.1 Project Description

The project is to improve the Town of Whitehall's water system. Whitehall is in Jefferson County, on Interstate 90, approximately 30 miles southeast of Butte and approximately 60 miles northwest of Bozeman, in Township 1N, Range 4W, Sections 3&4, and the tank is in Township 2N, Range 4W, Section 34. The approximate latitude and longitude of Whitehall is 45°52'12" N and 112°06' 03" W.

The project consists of two parts, one of which includes a treatment facility to address uranium in excess of the established maximum contaminant level (MCL) which we will refer to as the Uranium Project and another to address tank and distribution system improvements which we will refer to as Alternative 5 Project.

The proposed Alternative 5 Project will include recoating the interior of the existing bolted steel tank, replacing the existing 6" asbestos concrete (AC) watermain in Rocky Mountain Drive, and providing a distribution system loop.

1.2 Purpose and Need

The primary purpose of the Uranium Project is to provide clean drinking water to the residents of the Town of Whitehall. Whitehall's drinking water is high in arsenic and uranium to levels above the EPA established MCL. The Town has been in violation of the MCL since 2015 and has entered an Administration Order On Consent (AOC) with the Montana Department of Environmental Quality (DEQ) to address the problem. Failure to meet the conditions of the AOC constitutes a violation of Title 75, chapter 5, part 6, MCA, and may result in the Department seeking a court order requiring additional corrective action and assessing civil penalties. The project will improve the Town of Whitehall's drinking water quality by removing arsenic and uranium. The project is also expected to improve the quality of the storm water runoff to tributaries of the Jefferson River.

The primary purpose of the Alternative 5 Project is to address problems with the existing tank and within the distribution system. In September of 2017, the Town contracted Midco Diving to conduct a tank inspection. The inspection found leaking and interior staining, lifting, corrosion, pitting, and coating failures of the 500,000-gallon existing tank.

According to town officials the AC watermain in Rocky Mountain Drive is the only AC main left in the distribution system. All the other AC mains in town were replaced with the distribution system improvements project that was completed in 1996. The industry standard useful life of AC pipe is approximately 50 years. The AC main in Rocky Mountain Drive was installed in the mid 70's and is at or very near the end of its useful life. It is expected that by eliminating this last piece of AC main from the system, the DEQ required water sample for asbestos will also be eliminated. In addition to the AC pipe there are also problems in Rocky Mountain Drive with the locations of the curb stops. Many of the curb



stops along this main have been installed on private property and in residents' yards which is problematic for public works in the event of a required service shutoff.

Also, the newer commercial area of town that currently includes the Rodeway Inn Motel (formerly Super 8), a Town Pump, several businesses, a few vacant commercial lots, and a few existing residences are all currently fed by a dead-end main. Eliminating the dead-end main will increase the reliability of the water system and improve fire flows in this area.

2 ALTERNATIVES EVALUATED INCLUDING THE PROPOSED ACTION

2.1 Proposed Action/Preferred Alternative

The proposed Uranium Project will utilize the new town hall shop to house the treatment equipment with the remaining work taking place within the Town of Whitehall incorporated limits in existing streets and through an equipment and material staging area. The proposed Uranium Project includes the implementation of an Ion Exchange (IX) water treatment system in the new town hall shop. The two existing wells would be used as the water supply. The shop is 38 feet wide by 72 feet long, is currently unused, and has ceilings that are tall enough to house and maintain the treatment equipment. A new partition wall would be constructed separating the west end of the shop area from the rest of the shop. The west end would be used for the treatment facility leaving the remainder of the shop area for other Town uses. Improvements to the existing building would include electrical, HVAC, concrete pipe penetrations, and equipment structural supports. A raw 3,000 feet water pipeline would be constructed connecting well #1 (Division St Well), well #2 (Firehall Well), and the new treatment facility. The raw water pipeline would pass under the railroad tracks and under state HWY 2. After discussions with Montana Rail Link (MRL) it has been determined that the Town can utilize MRL property for installation of the pipeline. The existing wells would be videoed and cleaned at a minimum. It is expected that both existing wells will need some rehabilitation work and both pumps will need replaced. A treated water pipeline would be constructed between the treatment facility and the distribution system.

The following figure shows the extents of the Uranium Project.



Figure 1: Uranium Project



Alternative 5 would include recoating the interior walls, ceiling, floor, and associated appurtenances of the existing 500,000-gallon, bolted steel, ground storage tank. The interior of tank would be sandblasted to an SP-10 "Commercial" blast and the interior walls, ceiling, floor, and associated appurtenances would be coated with 2.5 to 3.5 mils of zinc primer and 12.0 to 16.0 mils of epoxy coat. The improvements would include welding, grinding, and steel repair of those areas that may need structural attention. The tank would be drained and removed from service temporarily during construction. Temporary provisions would be used to provide pressure to the system. The work would be completed between May and September and during times of lower water demand. All work relating to the tank is expected to be completed, at the latest, by November 30, 2021.

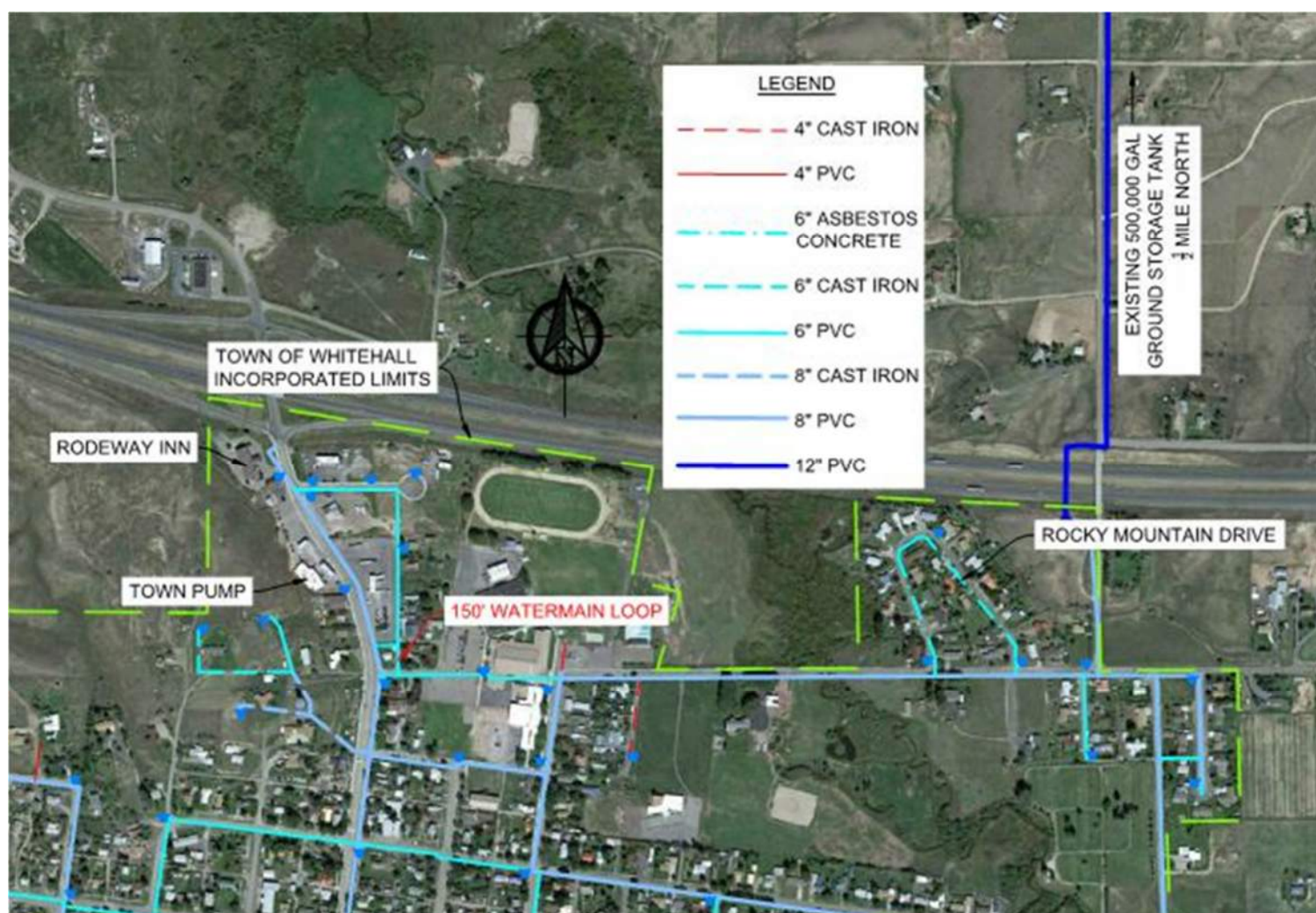
Also, approximately 1,500 feet of existing 6" AC watermain in Rocky Mountain Drive would be abandoned in place and new 6" PVC watermain would be installed next to it. The existing fire hydrants



and associated auxiliary valves are in good shape; therefore, the fire hydrant leads would be connected to the new PVC watermain. New service lines and curb stops would be provided between the new main and the property line where they would connect to the existing service lines. Rocky Mountain Drive is a paved City street requiring surface restoration to preconstruction conditions.

Additionally, approximately 150 feet of 6" PVC watermain would be installed in the alley south of N Pyfer Street between W Jackson Road and Yellowstone Trail. The additional watermain would add a looping connection to the water system that services the northern area of town currently served with a dead-end watermain. The new watermain would connect to the existing 6" PVC watermain on either end including appropriate valving at each connection.

Figure 2: Alternative 5 Plan





2.2 Other Alternatives Evaluated

The alternatives analyzed in the April 2018 Preliminary Engineering Report (PER), the December 2018 PER Update, and the December 2019 PER Update were as follows:

2.2.1 2018 PER

Alternative 1 – No Action

Alternative 2 – New Surface Water Source

Alternative 3 – New Ground Water Source

Alternative 4A – IX Treatment Plant at Rec Complex Using Existing Wells

Alternative 4B – IX Treatment Plant at Rec Complex Using 1 Existing Well and 1 New Well

Alternative 4C – IX Treatment Plant in Old Firehall Using Existing Wells

Water treatment options considered for the ground water treatment alternatives included Reverse Osmosis, Lime Softening, Coagulation/Filtration, and Ion Exchange (IX) treatments. IX treatment was concluded to be the most cost effective treatment option to mitigate the uranium MCL for the Town of Whitehall.

2.2.2 2018 PER Update

Alternative 4D – IX Treatment Plant at New Town Hall Using Existing Wells

Alternative 4E – IX Treatment Plant at New Town Hall Using 1 Existing Well and 1 New Well

2.2.3 2019 PER Update

Alternative 5 – Recoat Tank, Replace AC Main, and Provide Distribution System Loop Through Alley

Alternative 6 – Recoat Tank, Replace AC Main, and Provide Distribution System Loop Through School Property

2.3 No Action Alternative

This alternative includes taking no action to address the existing problems with the system. The wells would continue to operate as they have in the past by providing water that is in violation of the EPA established MCA for uranium. This alternative would not follow the AOC that the Town has entered into with the DEQ. The AOC requires the system be brought into compliance within the specified timeframe. If no action is taken, the Town will default on its agreement with DEQ potentially resulting in monetary violations. Inaction would result in no change to the operating costs currently experienced by the system until the EPA and DEQ began monetary violations. An EPA non-compliant system is not sustainable.



3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Land Use/Land Ownership

3.1.1 *Affected Environment*

The Town of Whitehall owns the building the treatment system would be installed in. The Town owns most of the pipe line corridor for the treatment system except for a state HWY 2 crossing, a Montana Rail Link (MRL) railroad crossing, and a small piece of private property.

The Town owns the land the water storage tank is located on, the Rocky Mountain Drive right-of-way, and the alley to be used for the distribution loop. There is no known land acquisition or permitting requirements to accommodate Alternative 5.

According to the Natural Resources Conservation Service (NRCS), soils information for the proposed project area includes 324A – Fairway clay loam, 326A – Fairway-Moltoner complex, and 401A – Moltoner silty clay loam.

According to the NRCS Soil Data Access (SDA) Prime and other Important Farmlands for Jefferson County Area and Part of Silver Bow County, Montana the above-mentioned soils are designated as follows:

- 324A – Fairway clay loam – Prime farmland if irrigated
- 326A – Fairway-Moltoner complex – Farmland of Local Importance
- 401A – Moltoner silty clay loam – Not Prime Farmland

The NRCS Soils Map and the SDA Prime and other Important Farmlands information is included in Appendix A.

3.1.2 *Environmental Consequences*

A Phase I Environmental Site Assessment nor a Transaction Screen Questionnaire has been completed on the proposal site within the past 6 months. As part of the 2018 PER, a Uniform Environmental Checklist was completed and can be found in Appendix B. In addition to the checklist, an Environmental Review Form was prepared in accordance with TSEP 2018 Construction Application Guidelines for the 2021 Biennium and is also included in Appendix B. Several federal and state agencies were contacted to identify any potential environmental impacts that might be associated with the projects. The correspondence with the affected agencies is included in Appendix C.

The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed. The proposed project is not expected to adversely impact existing farmlands.



3.1.3 *Mitigation*

Permits will be required to cross state HWY 2 and the two MRL rails. An easement will need to be negotiated with the one private property owner. A site title opinion from the Town's attorney will be required prior to moving the project forward. Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures.

3.2 *Floodplains*

3.2.1 *Affected Environment*

A review of the Federal Emergency Management Agency (FEMA) Floodplain Map indicates the majority of Whitehall, including the location of the proposed treatment facility and all watermain improvement locations, is in a FEMA designated zone X. A zone X designation indicates the area is outside the 0.2% annual chance floodplain (500-year floodplain). There are areas inside the city limits designated as special flood hazard areas subject to inundation by the 1% annual chance flood (100-year flood). The FEMA Floodplain Map for Whitehall is included in Appendix D.

3.2.2 *Environmental Consequences*

The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed and do not contain special flood hazard zones.

3.2.3 *Mitigation*

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures.

3.3 *Wetlands*

3.3.1 *Affected Environment*

The soils map for the area was downloaded from the Natural Resources Conservation Service (NRCS) website along with a wetland map for the area from the US Fish and Wildlife Service's (USFWS) National Wetland Inventory. The wetland map indicates there are no wetlands in the project area. The NRCS soils information is included in Appendix A and the USFWS Wetland Map is included in Appendix D.



3.3.2 *Environmental Consequences*

The US Army Corp of Engineers (USACE) was contacted, and comments requested regarding potential project impacts. Under the authority of Section 404 of the Clean Water Act, DA permits are required of the discharge of fill material into waters of the US. Waters of the US include the area below the ordinary high-water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. The project does not include discharge of fill material into waters of the US. The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed and do not contain wetland zones.

The correspondence from the USACE is included in Appendix C.

3.3.3 *Mitigation*

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures.

3.4 Cultural Resources

3.4.1 *Affected Environment*

The Montana State Historic Preservation Office (SHPO) was contacted, and comments requested regarding potential project impacts to cultural resources. SHPO conducted a cultural resource file search for the affected area within the Uranium Project and Alternative 5.

3.4.2 *Environmental Consequences*

According to SHPO's records "there have been a few previously recorded sites within the designated search locale. In addition to the sites there have been a few previously conducted cultural resource inventories done in the areas." Also, according to SHPO, "If any structures are to be altered and are over fifty years old, we would recommend that they be recorded, and a determination of their eligibility be made. Based on previous disturbances in the proposed project area we feel that a recommendation for a cultural resource inventory is unwarranted at this time."

The list of the sites, the previously conducted cultural resource inventories, and the correspondence from SHPO is included in Appendix C.



3.4.3 Mitigation

An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures.

3.5 Biological Resources

3.5.1 General Fish, Wildlife and Vegetation

3.5.1.1 Affected Environment

The Montana Natural Heritage Program (MTNHP), Montana Fish, Wildlife, and Parks (MFWP), and US Fish and Wildlife Services (USFWS) were contacted to identify any potential environmental impacts that might be associated with the projects, and comments requested regarding potential project impacts. Montana Fish, Wildlife, and Parks (MFWP) did not respond to our request.

The MTNHP provided an Environmental Summary report summarizing information managed in the MTNHP databases for: species occurrence; other observed species without species occurrences; other species potentially present based on their range, presence of associated habitats, or predictive distribution model output if available; structured surveys (organized efforts following a protocol capable of detecting one or more species); land cover mapped as ecological systems; wetland and riparian mapping; land management categories; and biological reports associated with plant and animal observations.

3.5.1.2 Environmental Consequences

The project could have a positive impact on biological resources. Whitehall utilizes a lagoon to treat its wastewater (MPDES Permit No. MT0020133). Wastewater is stored in the lagoon during the winter months and is land applied to a farm field adjacent to Big Pipestone Creek and the Jefferson Slough during the growing season. Big Pipestone Creek and Jefferson Slough enter the Jefferson River just downstream of Whitehall.

According to the Final-Jefferson River Metals Project Area Total Maximum Daily Level (TMDL)s and Water Quality Improvements Plan prepared by the DEQ in 2014, the Jefferson River, lower Jefferson River, Big Pipestone Creek, and the Jefferson Slough are impaired due to metals. Also, according to the report, because metal concentrations were found to be above the human health target, arsenic will be listed as a cause of impairment to Big Pipestone Creek and Jefferson Slough.



The report indicates potential metals sources identified in the Big Pipestone Creek Watershed include the Whitehall wastewater treatment plant (WWTP) and at low flows elevated arsenic values in the WWTP discharge could be a significant source of loading to Big Pipestone Creek.

The discharge from the Whitehall WWTP is the same water that is pumped from the town's water supply; therefore, is high in arsenic and uranium. Since Whitehall's lagoon land applies the discharge water to property adjacent to Jefferson Slough and Big Pipestone Creek, reducing the amount of arsenic and uranium from the public water supply, as proposed with this project, will remove concentrations of arsenic and uranium from the land adjacent to the Jefferson Slough and Big Pipestone Creek; therefore, improving the quality of the storm water runoff ultimately to the Jefferson River.

According to the Final-Jefferson River Metals Project Area TMDLs and Water Quality Improvements Plan prepared by the DEQ in 2014, "elevated concentrations of metals can impair the support of numerous beneficial uses including: aquatic life, primary contact recreation, drinking water, and agriculture. Within aquatic ecosystems, metals can have a toxic, carcinogenic, or bioconcentrating effect on biota. Likewise, humans and wildlife can suffer acute and chronic effects from consuming water or fish with elevated metals concentrations. Because elevated metals concentrations can be toxic to plants and animals, high metals concentrations in irrigation or stock water may also affect agricultural uses. Although arsenic is technically a metalloid, it is treated as a metal for TMDL development due to the similarity in sources, environmental effects, and restoration strategies."

The proposed project will remove arsenic and uranium from the Town of Whitehall's source water, tributaries of the Jefferson River, and ultimately the Jefferson River.

Neither the MTNHP or USFWS mentioned any potential environmental impacts that might be associated with the projects regarding fish, wildlife, or vegetation. The correspondence from the MTNHP and USFWS are included in Appendix C.

3.5.1.3 Mitigation

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures.

Prior to construction the contractor will be required to obtain a Storm Water Pollution Prevention Plan (SWPPP) permit to meet storm water requirements including revegetation of any disturbed areas.



3.5.2 Listed Threatened and Endangered Species

3.5.2.1 Affected Environment

The State and Federal Fish and Wildlife Services were both contacted, and comments requested regarding potential project impacts. Montana Fish, Wildlife, and Parks (MFWP) did not respond to our request. Comments from the US Fish and Wildlife Services (USFWS) were prepared under the authority of, and in accordance with, the provisions of the Endangered Species Act. We reviewed the list of endangered species by County available from the USFWS and the following species were identified for Jefferson County; Ute Ladies' Tresses, Canada Lynx, Grizzly Bear, Wolverine, and the Whitebark Pine.

Although not warranted as an endangered species, the sage grouse was considered for listing under the Endangered Species Act as recently as 2015. The Montana Sage Grouse Habitat Conservation Program does not classify the Town of Whitehall, or any immediate surrounding area to Whitehall, as a sage grouse habitat.

The Montana Sage Grouse Habitat Conservation Map is included in Appendix C.

3.5.2.2 Environmental Consequences

The USFWS indicated that since the proposed project is within an existing municipal development setting, they do not anticipate project implementation to result in adverse effects to listed, proposed, or candidate threatened or endangered species, or listed or proposed critical habitat.

The correspondence from the USFWS and the list of endangered species by County is included in Appendix C.

3.5.2.3 Mitigation

An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures.

3.5.3 Migratory Bird Treaty Act

3.5.3.1 Affected Environment

The State and Federal Fish and Wildlife Services were both contacted, and comments requested regarding potential project impacts. Montana Fish, Wildlife, and Parks (MFWP) did not respond to our request. Comments from the US Fish and Wildlife Services (USFWS) were prepared under the authority of, and in accordance with, the provisions of the Migratory Bird Treaty Act.



3.5.3.2 Environmental Consequences

According to the USFWS, the proposed project could have potential effects on migratory birds. The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed.

The correspondence from the USFWS is included in Appendix C.

3.5.3.3 Mitigation

An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures outside of the general guidelines provided by the USFWS. Per the USFWS, "To the extent practicable, necessary vegetation clearing, grubbing, and filling construction activities should be scheduled so as to avoid and minimize impacts to nesting birds, if present in the project area. If work is proposed to take place in migratory bird habitats that may result in take of migratory birds, their eggs, or active nests, the Service recommends that the project proponent take all practicable measures to avoid and minimize take, such as maintaining adequate buffers, to protect the birds until the young have fledged. Active nests may not be removed." We have not witnessed, nor do we expect nesting migratory birds within the project corridor.

3.5.4 Bald and Golden Eagle Protection Act

3.5.4.1 Affected Environment

The State and Federal Fish and Wildlife Services were both contacted, and comments requested regarding potential project impacts. Montana Fish, Wildlife, and Parks (MFWP) did not respond to our request. Comments from the US Fish and Wildlife Services (USFWS) were prepared under the authority of, and in accordance with, the provisions of the Bald and Golden Eagle Protection Act.

3.5.4.2 Environmental Consequences

According to the USFWS, there are no known bald or golden eagle nests within one mile of the project. The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on town owned property. The areas planned for disturbance are areas that have been previously disturbed.

The correspondence from the USFWS is included in Appendix C.



3.5.4.3 *Mitigation*

An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures outside of the general guidelines provided by the USFWS. Per the USFWS, “If active eagle nests are present within 0.5 miles of the project during construction, we recommend that the proponent comply with seasonal restrictions and construction/development distance buffers specified in the 2010 Montana Bald Eagle Management Guidelines: An Addendum to Montana Bald Eagle Management Plan (1994) in order to avoid/minimize the risk for eagle take.” We have not witnessed, nor do we expect nesting bald or golden eagles within the project corridor.

3.5.5 *Invasive Species*

3.5.5.1 *Affected Environment*

The Montana Natural Heritage Program (MTNHP), Montana Fish, Wildlife, and Parks (MFWP), and US Fish and Wildlife Services (USFWS) were contacted, and comments requested regarding potential project impacts. Montana Fish, Wildlife, and Parks (MFWP) did not respond to our request.

3.5.5.2 *Environmental Consequences*

Neither the MTNHP nor the USFWS mentioned concerns regarding invasive species. The correspondence from the MTNHP and USFWS are included in Appendix C.

3.5.5.3 *Mitigation*

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected environmental impacts that would result in a need for mitigation measures.

3.6 *Water Resources*

3.6.1 *Water Quantity*

3.6.1.1 *Affected Environment*

Water is supplied to the Town of Whitehall’s public water system from two groundwater wells referred to as well #1 and well #2. The wells are both located in town. The two submersible pumps are the only



pumps on the system and are controlled by a pressure transducer at the tank. Well #1 pumps approximately 400 gpm and the pump is at least 3 years old. Well #2 pumps approximately 300 gpm and the pump is about 2 years old. The Town of Whitehall's water storage is provided by a 500,000-gallon bolted steel ground storage tank that was constructed in 1996.

In accordance with Montana Department of Environmental Quality (DEQ) Circular 1, the water source and treatment facilities must be designed for maximum day demand in the design year. Our design year is 2038. The 2038 population is projected to be 1,099 based on census information over the last several decades. The 2038 projected average and peak day demands for Whitehall are 215,801 gpd (150 gpm) and 665,864 gpd (462 gpm), respectively. The two wells together can produce 700 gpm or 1,008,000 gpd. DEQ requires that the system be analyzed with the largest well out of service; therefore, the system could provide 432,000 gpd with the largest well out of service. The wells have capacity to serve the projected population in 2038.

The Town has a good water right for its municipal use. The Town of Whitehall has a water right for up to 1,250 gpm or 1,800,000 gpd total for the two wells. The rights are limited to the amount of the historic use recognized by the DNRC unless the historic use is reduced under adjudication proceedings. Since the pre-1973 population is very near the projected 2038 population it is expected that the historical use recognized by the DNRC would be very near or even greater than the projected 2038 use.

In 2016 the Insurance Services Office, Inc (ISO) conducted an analysis on the water system including and extensive fire hydrant flow and pressure testing procedure. According to the ISO the biggest fire flow that will count against/for Whitehall is 3,000 gpm for a duration of 3 hours. The ISO analysis indicated that the system could supply 5,000 gpm for up to 2 hours and 3,975 gpm for up to 3 hours. According to the ISO the existing storage capacity is adequate.

Since the April 2018 PER and December 2018 PER Update, the Town identified the need to replace the existing AC watermain in Rocky Mountain Drive. According to town officials the AC main in Rocky Mountain Drive is the only AC main left in the distribution system. The Town also wanted to consider options for eliminating the dead-end main in the north end of town.

3.6.1.2 Environmental Consequences

The tank is a critical component of the system that provides both pressure and storage which are critical to the public health and safety, especially in the event of a fire. Asbestos is harmful to public health and safety; therefore, eliminating it from the system, via the new 6" PVC watermain in Rocky Mountain Drive, has obvious public health and safety benefits. Looping the dead-end watermain not only allows redundancy in the distribution system limiting water outages to the area but also eliminates locations in the system for water to become stagnant resulting in a public health and safety concern. Eliminating the dead-end main will increase the reliability of the water system and improve fire flows in the newer commercial area of town that includes a Hotel, a Town Pump, several businesses, and a few existing residences which are all currently fed by a dead-end main.



It is expected that Alternative 5 would include less overall disturbance to the natural and human environment since the amount of pipe to be installed (150' in length, 6" PVC) is less than that of Alternative 6 (1400' in length, 6" PVC). Less pipe requires less ground disturbance and less construction time. Less construction time results in less impact to the human environment via less construction noise, traffic control impacts, dust, and construction related impacts to the public.

During the April 2018 PER and December 2018 PER Update the Town was planning to incorporate addressing the problems and recoating the interior of the tank into their regular O&M budget. With the extents of the Uranium Project, the Town has since decided to complete the recoating of the interior of the tank at the same time as the Uranium Project.

3.6.1.3 Mitigation

It will be necessary to drain the tank for the duration of the tank coating process which could take up to several weeks depending on temperature and weather conditions. The existing pressure and pump controls are established based on tank levels. To maintain pressure in the system while the tank is being worked on it will be necessary to establish a temporary pressure plan that could include a temporary tank, one of the existing tanks, or a configuration to allow the pumps and distribution system to provide pressure.

The existing AC watermain in Rocky Mountain Drive will be left in place and utilized for service until the new PVC main is installed and tested. If it is determined that it is not possible to use the existing watermain throughout the replacement project a temporary water plan would be utilized to provide potable water service to the area. There are no anticipated construction problems that cannot be addressed.

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts.

3.6.2 Water Quality

3.6.2.1 Affected Environment

The available DEQ records show the wells tested positive for arsenic since at least 2011; although, the running annual average MCL of 0.010 mg/L Arsenic hasn't need exceeded since at least 2011. The wells have also tested high for gross alpha readings, resulting in a running annual average greater than the MCL and gross alpha violations in 2014 and 2015. The Town began monitoring the wells for uranium in 2015 and has been in violation of the running annual average MCL of 30 mcg/L uranium since 2015. The following table summarizes some of the recent DEQ correspondence.



Table 1: Summary of Recent DEQ Correspondence

	DATE OF CORRESPONDENCE	SAMPLE	READING	MCL	DEQ COMMENTS	
TOTAL COLIFORM	9/5/2014	various taps	2 positive samples	1 positive sample	VIOLATION	health advisory issued, notify public, additional sampling
	10/16/2014	various taps				
ARSENIC	10/1/2014	Division St Well (1)	0.012 mg/L	0.010 mg/L	NO VIOLATION	begin quarterly monitoring
	12/30/2014		0.008 mg/L			continue quarterly monitoring
	2/25/2015		0.007 mg/L			
	7/28/2015		0.010 mg/L			
	12/30/2015		0.008 mg/L			
GROSS ALPHA	10/1/2014	Division St Well (1)	46 pCi/L	15 pCi/L	NO VIOLATION	begin quarterly monitoring
		Firehall Well (2)	66 pCi/L		VIOLATION	begin quarterly monitoring
	12/16/2014	Division St Well (1)	26 pCi/L		VIOLATION	continue quarterly monitoring for gross alpha and begin quarterly monitoring for uranium, notify public, implement corrective action
	2/25/2015	Division St Well (1)	0 pCi/L		VIOLATION	continue quarterly monitoring for gross alpha and uranium
		Firehall Well (2)	0 pCi/L			
	5/26/2015	Division St Well (1)	17.6 pCi/L		NO VIOLATION	continue quarterly monitoring for gross alpha and uranium
URANIUM	3/10/2015	Division St Well (1)	31 mcg/L	30 mcg/L	NO VIOLATION	continue quarterly monitoring
		Firehall Well (2)	43 mcg/L		NO VIOLATION	continue quarterly monitoring
	5/27/2015	Division St Well (1)	31.2 mcg/L		VIOLATION	continue quarterly monitoring, notify public, possible enforcement
		Firehall Well (2)	38.1 mcg/L		VIOLATION	
	8/25/2015	Division St Well (1)	45 mcg/L		VIOLATION	continue quarterly monitoring, notify public, pursue corrective action, possible enforcement
	9/8/2015	Firehall Well (2)	51 mcg/L		VIOLATION	
	12/30/2015	Division St Well (1)	38.3 mcg/L		VIOLATION	
		Firehall Well (2)	40.5 mcg/L		VIOLATION	
	3/3/2016	Division St Well (1)	31 mcg/L		VIOLATION	
		Firehall Well (2)	40 mcg/L		VIOLATION	
	5/17/2016	Division St Well (1)	46 mcg/L		VIOLATION	
		Firehall Well (2)	31 mcg/L		VIOLATION	
	8/4/2016	Division St Well (1)	33 mcg/L		VIOLATION	
		Firehall Well (2)	41 mcg/L		VIOLATION	
	12/8/2016	Division St Well (1)	26 mcg/L		VIOLATION	
	2/14/2017	Firehall Well (2)	43 mcg/L		VIOLATION	
	11/7/2017	Firehall Well (2)	41 mcg/L		VIOLATION	
	11/20/2017	Firehall Well (2)	43 mcg/L		VIOLATION	continue quarterly monitoring, notify public, implement compliance plan

3.6.2.2 Environmental Consequences

The project could have a positive impact on biological resources. Whitehall utilizes a lagoon to treat its wastewater (MPDES Permit No. MT0020133). Wastewater is stored in the lagoon during the winter



months and is land applied to a farm field adjacent to Big Pipestone Creek and the Jefferson Slough during the growing season. Big Pipestone Creek and Jefferson Slough enter the Jefferson River just downstream of Whitehall.

According to the Final-Jefferson River Metals Project Area TMDLs and Water Quality Improvements Plan prepared by the DEQ in 2014, the Jefferson River, lower Jefferson River, Big Pipestone Creek, and the Jefferson Slough are impaired due to metals. Also, according to the report, because metal concentrations were found to be above the human health target, arsenic will be listed as a cause of impairment to Big Pipestone Creek and Jefferson Slough.

The report indicates potential metals sources identified in the Big Pipestone Creek Watershed include the Whitehall WWTP and at low flows elevated arsenic values in the WWTP discharge could be a significant source of loading to Big Pipestone Creek.

The discharge from the Whitehall WWTP is the same water that is pumped from the town's water supply; therefore, is high in arsenic and uranium. Since Whitehall's lagoon land applies the discharge water to property adjacent to Jefferson Slough and Big Pipestone Creek, reducing the amount of arsenic and uranium from the public water supply, as proposed with this project, will remove concentrations of arsenic and uranium from the land adjacent to the Jefferson Slough and Big Pipestone Creek; therefore, improving the quality of the storm water runoff ultimately to the Jefferson River.

According to the Final-Jefferson River Metals Project Area TMDLs and Water Quality Improvements Plan prepared by the DEQ in 2014, "elevated concentrations of metals can impair the support of numerous beneficial uses including: aquatic life, primary contact recreation, drinking water, and agriculture. Within aquatic ecosystems, metals can have a toxic, carcinogenic, or bioconcentrating effect on biota. Likewise, humans and wildlife can suffer acute and chronic effects from consuming water or fish with elevated metals concentrations. Because elevated metals concentrations can be toxic to plants and animals, high metals concentrations in irrigation or stock water may also affect agricultural uses. Although arsenic is technically a metalloid, it is treated as a metal for TMDL development due to the similarity in sources, environmental effects, and restoration strategies."

The proposed project will remove arsenic and uranium from the Town of Whitehall's source water, tributaries of the Jefferson River, and ultimately the Jefferson River.

3.6.2.3 Mitigation

Pulling uranium out of the water supply will produce a concentration of uranium. The uranium would be concentrated on the anion exchange resin over time potentially to levels that may require special handling and disposal procedures. We anticipate that the disposable Ion Exchange (IX) resin/media would be used to exhaustion and then disposed of. If the spent IX resin exceeds a 0.05% concentration of uranium by weight it would require special handling and would need to be removed by a radiation safety officer who would replace the resin and transport and dispose of the uranium-laden resin at a special landfill in Clive, Utah. Some considerations are that if the IX resin is less than 0.05% by weight uranium, then it would be deemed an "unimportant quantity" of radioactive waste and may be exempt from Nuclear Regulatory Commission (NRC) regulation and be exempt from specific licensing



requirements (A Regulator's Guide to the Management of Radioactive Residuals from Drinking Water Treatment Technologies, US EPA, 2005). For IX resin with higher than 0.05% by weight uranium, specific licensing requirements would apply, and disposal costs would be higher. We anticipate that removal and disposal of the spent IX resin will be handled by a radiation safety officer.

The water system can continue to operate as it historically has during construction of the water treatment facility and the new pipelines. Once the treatment facility is ready to go online the wells would be disconnected from the distribution system and connected to the raw water pipeline. This separation will need to be provided by more than just a valve. It will need to be a physical separation to ensure there is not a cross connection of the distribution system to the raw water line or the wells. The railroad tracks will require a jack and bore installation. Also, HWY 2 is likely to require a jack and bore to ensure traffic flow is maintained. There are no anticipated construction problems that cannot be addressed.

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts.

3.7 Socioeconomics and Environmental Justice

3.7.1 *Affected Environment*

The entire population of Whitehall will be affected by this project. According to data from the 2010 US Census conducted by the US Census Bureau, the population of the Town of Whitehall is 1,038 with 473 total households. 72.77% of the Whitehall community is considered at low- and moderate-income level (LMI). The proposed water system improvements benefit 100% of the town. Therefore, 100% of the LMI population will benefit from, and contribute to, the project.

3.7.2 *Environmental Consequences*

The following table summarizes the funding strategy and total project costs from the 2018 PER, 2018 PER Update, and the 2019 PER Update.



Table 2: Total Project Cost Estimate

Item	2018 PER and 2018 PER Update – Uranium Project							2019 PER Update – Alternative 5		
	Funding Source						Total	Funding Source		Total
	TSEP	CDBG	RRGL	30% RD Grant	RD Loan	Local		30% RD Grant	RD Loan	
	Administration							Administration		
Personnel Costs	\$1,000						\$1,000			\$0
Office Costs	\$1,000						\$1,000			\$0
Grant and Loan Admin		\$15,000		\$7,500	\$7,500		\$30,000	\$1,500	\$3,500	\$5,000
Legal Costs					\$3,500		\$3,500			\$0
Audit Fees						\$3,000	\$3,000			\$0
Travel & Training	\$500						\$500			\$0
Loan Origination Fees							\$0			\$0
Interim Interest							\$0			\$0
Loan Reserves					\$17,130		\$17,130	\$6,198	\$ 14,463	\$20,661
Bond Counsel				\$5,000	\$15,000		\$20,000			\$0
Total Administrative	\$2,500	\$15,000	\$0	\$12,500	\$43,130	\$3,000	\$76,130	\$7,698	\$17,963	\$25,661
	Construction Related Activities							Construction Related Activities		
Land Acquisition				\$5,000			\$5,000			\$0
Preliminary Engineering							\$0			\$0
Engineering Design	\$144,474						\$144,474	\$14,796	\$34,523	\$49,318
Construction Engineering Services		\$144,474					\$144,474	\$14,796	\$34,523	\$49,318
Construction	\$440,000	\$260,000	\$115,000	\$122,248	\$285,244		\$1,222,492	\$134,505	\$313,845	\$448,349
Contingency	\$38,026	\$30,526	\$10,000	\$13,110	\$30,587		\$122,249	\$13,450	\$31,384	\$44,835
Total Construction Activity	\$622,500	\$435,000	\$125,000	\$140,358	\$315,831	\$0	\$1,638,689	\$177,546	\$414,275	\$591,821
Total Project Budget	\$625,000	\$450,000	\$125,000	\$152,858	\$358,961	\$3,000	\$1,714,819	\$185,245	\$432,238	\$617,482

To estimate the increase in user fees for the Uranium Project; the debt service and the increase in O&M must be considered. The estimated debt service based on a \$358,961, thirty-year, RD loan at the poverty interest rate of approximately 2.5% is \$17,130 per year or \$1,428 per month.



The uranium treatment plant will require additional O&M requirements. The projected O&M increase includes special handling of the spent IX resin. The resin would be removed by a radiation safety officer who would replace the resin and transport and dispose of the uranium-laden resin at a special landfill in Clive, Utah. In addition to residuals disposal, the plant will require additional operator time, process chemical, and electrical usage. The addition O&M cost is estimated to be approximately \$68,000 per year or \$5,670 per month.

The total increase in user fees is estimated to be \$7,098 per month. The total number of per equivalent dwelling unit (EDU)'s is 573 as presented in the 2018 PER. The additional cost per EDU can be calculated as follows:

$\$7,098 \text{ per month} / 573 \text{ EDU's} = \$12.39/\text{EDU/month}$.

The total estimated USDA RD funds would be approximately \$338,103 in grant and \$791,199 in loan for a total of \$1,129,302.

The existing Treasure State Endowment Program (TSEP), Community Development Block Grant (CDBG), Renewable Resource Grant and Loan Program (RRGL) grant funds can only be used for the Uranium Project and cannot be used to fund the improvements from this 2019 PER Update. Also, the match for the TSEP, CDBG, and RRGL grant funds can only come from the Uranium Project; therefore, we will administratively keep the Uranium Project and Alternative 5 separate while running them on the same schedule.

Only USDA RD funds will be utilized to implement Alternative 5 - Recoat Tank, Replace AC Main, and Provide Distribution Loop Through Alley.

To estimate the increase in user fees for Alternative 5; the debt service and the increase in O&M must be considered. We do not anticipate additional O&M costs with the implementation of Alternative 5 but there will be costs to service the additional debt. The estimated Alternative 5 debt service based on a \$432,238, thirty-year, RD loan at the poverty interest rate of approximately 2.5% is \$20,661 per year or \$1,722 per month.

The additional cost per EDU can be calculated as follows:

$\$1,722 \text{ per month} / 573 \text{ EDU's} = \$3.00/\text{EDU/month}$.

In the 2018 PER, the 2016 water only rate was calculated to be \$29.00/EDU/month and the 2016 sewer only rate was \$47.71/EDU/month. In October of 2018, the town raised the water and sewer base rates by \$10.05 and \$9.90, respectively. The estimated monthly rates per EDU and anticipated rate increases is summarized in the following table.



Table 3: Summary of User Fees

Utility	2016	2018		Uranium Project		Alternative 5	
		Increase	Total	Increase	Total	Increase	Total
Water	\$29.00	\$10.05	\$39.05	\$12.39	\$51.44	\$3.00	\$54.44
Sewer	\$47.71	\$9.90	\$57.61	\$0.00	\$57.61	\$0.00	\$57.61
Combined	\$76.71	\$19.95	\$96.66	\$12.39	\$109.05	\$3.00	\$112.05

3.7.3 Mitigation

All alternatives considered to improve the Town of Whitehall's water supply were considered with due diligence to ensure the most cost-effective methods were selected. The Town of Whitehall has applied and has been awarded the following grants to help mitigate the costs for implementation of the Uranium Project:

- \$625K – TSEP
- \$450K – CDBG \$125K – DNRC RRGL
- \$125K – DNRC RRGL

The Town also applied to USDA RD for a combination grant and loan for the Uranium Project as follows:

- \$152,858 – USDA RD Grant
- \$358,961 – USDA RD Loan

The remaining \$3,000 would come from the town as local match.

Only USDA RD funds will be utilized to implement Alternative 5. The Town will apply to USDA RD for a combination grant and loan for Alternative 5 as follows:

- \$185,245 – USDA RD Grant
- \$432,238 – USDA RD Loan

The total estimated USDA RD funds for both projects would be approximately \$338,103 in grant and \$791,199 in loan for a total of \$1,129,302.

3.8 Miscellaneous Environment/Environmental Consequences

3.8.1 Affected Environment

The proposed Uranium Project includes the implementation of an Ion Exchange (IX) water treatment system in the new town hall shop. Improvements to the existing building would include electrical, HVAC, concrete pipe penetrations, and equipment structural supports. A raw 3,000 feet water pipeline would be constructed connecting well #1, well #2, and the new treatment facility. The raw water pipeline would pass under the railroad tracks and under state HWY 2. A treated water pipeline would be



constructed between the treatment facility and the distribution system. The existing wells would be videoed and cleaned at a minimum. It is expected that both existing wells will need some rehabilitation work and both pumps will need replaced. A treated water pipeline would be constructed between the treatment facility and the distribution system.

Alternative 5 would include recoating the interior walls, ceiling, floor, and associated appurtenances of the existing 500,000-gallon, bolted steel, ground storage tank. The tank would be sandblasted to an SP-10 “Commercial” blast and the interior walls, ceiling, floor, and associated appurtenances would be coated with 2.5 to 3.5 mils of zinc primer and 12.0 to 16.0 mils of epoxy coat. The improvements would include welding, grinding, and steel repair of those areas that may need structural attention.

Also, approximately 1,500 feet of existing 6” AC watermain in Rocky Mountain Drive would be abandoned in place and new 6” PVC watermain would be installed next to it. The existing fire hydrants and associated auxiliary valves are in good shape; therefore, the fire hydrant leads would be connected to the new PVC watermain. New service lines and curb stops would be provided between the new main and the property line where they would connect to the existing service lines. Rocky Mountain Drive is a paved City street requiring surface restoration to preconstruction conditions.

Additionally, approximately 150 feet of 6” PVC watermain would be installed in the alley south of N Pyfer Street between W Jackson Road and Yellowstone Trail. The additional watermain would add a looping connection to the water system that services the northern area of town currently served with a dead-end watermain. The new watermain would connect to the existing 6” PVC watermain on either end including appropriate valving at each connection.

3.8.2 Environmental Consequences

Construction activities relating to both the Uranium Project and Alternative 5 will result in temporary noise, vibration, and dust generation. Traffic patterns/controls may need altered as construction activities progress. The influx of construction crews and equipment may cause a short-term visual impairment to the local environment.

3.8.3 Mitigation

Construction activities would be completed during times of lower water demand and are expected to be completed, at the latest, by November 30, 2021.

An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. With the implementation of the selected projects there are no expected long-term environmental impacts that would result in a need for mitigation measures.



Prior to construction the contractor will be required to obtain a Storm Water Pollution Prevention Plan (SWPPP) permit to meet storm water requirements including revegetation of any disturbed areas.

4 CUMULATIVE EFFECTS

The primary purpose of the Uranium Project is to provide clean drinking water to the residents of the Town of Whitehall. Whitehall's drinking water is high in arsenic and uranium to levels above the EPA established MCL. The Town has been in violation of the MCL since 2015 and has entered an AOC with the DEQ to address the problem. Failure to meet the conditions of the AOC constitutes a violation of Title 75, chapter 5, part 6, MCA, and may result in the Department seeking a court order requiring additional corrective action and assessing civil penalties. The Uranium Project will improve the Town of Whitehall's drinking water quality by removing arsenic and uranium. The project will also improve the quality of the storm water runoff to tributaries of the Jefferson River.

The primary purpose of the Alternative 5 Project is to address problems with the existing tank and within the distribution system. In September of 2017, the Town contracted Midco Diving to conduct a tank inspection. The inspection found leaking and interior staining, lifting, corrosion, pitting, and coating failures of the 500,000-gallon existing tank. The tank is a critical component of the system that provides both pressure and storage which are critical to the public health and safety, especially in the event of a fire. Asbestos is harmful to public health and safety; therefore, eliminating it from the system, via the new 6" PVC watermain in Rocky Mountain Drive, has obvious public health and safety benefits. Looping the dead-end watermain not only allows redundancy in the distribution system limiting water outages to the area but also eliminates locations in the system for water to become stagnant resulting in a public health and safety concern. Eliminating the dead-end main will increase the reliability of the water system and improve fire flows in the newer commercial area of town that includes a Hotel, a Town Pump, several businesses, and a few existing residences which are all currently fed by a dead-end main.

5 SUMMARY OF MITIGATION

Adverse environmental impacts are not expected with the implementation of the Uranium Project and Alternative 5. All the work is expected to take place in areas that have been previously disturbed. There are no known previously undisturbed areas, floodplains, wetlands, historical or archaeological properties, endangered species, or other areas of environmental concern in the project area. USFWS guidelines will be adhered to in response to any migratory birds, or bald or golden eagles found present within the project area.

The storage tank will be drained for the duration of the tank coating process which could take up to several weeks depending on temperature and weather conditions. The existing pressure and pump controls are established based on tank levels. To maintain pressure in the system while the tank is being worked on a temporary pressure plan will be established that could include a temporary tank, one of the existing tanks, or a configuration to allow the pumps and distribution system to provide pressure.



The existing AC watermain in Rocky Mountain Drive will be left in place and utilized for service until the new PVC main is installed and tested. If it is determined that it is not possible to use the existing watermain throughout the replacement project a temporary water plan would be utilized to provide potable water service to the area. There are no anticipated construction problems associated with the construction of the distribution system loop through the alley.

The water system can continue to operate as it historically has during construction of the water treatment facility and the new pipelines. Once the treatment facility is ready to go online the wells would be disconnected from the distribution system and connected to the raw water pipeline. This separation will need to be provided by more than just a valve. It will need to be a physical separation to ensure there is not a cross connection of the distribution system to the raw water line or the wells. The railroad tracks will require a jack and bore installation. Also, HWY 2 is likely to require a jack and bore to ensure traffic flow is maintained.

Pulling uranium out of the water supply will produce a concentration of uranium. The uranium would be concentrated on the anion exchange resin over time potentially to levels that may require special handling and disposal procedures. The waste concentrations of uranium would be handled in accordance with all state and federal requirements.

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. An onsite Resident Project Representative (RPR) employed by the design engineer responsible will be onsite during construction activity. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts.

Prior to construction the contractor will be required to obtain a Storm Water Pollution Prevention Plan (SWPPP) permit to meet storm water requirements including revegetation of any disturbed areas.

6 COORDINATION, CONSULTATION AND CORRESPONDENCE

State and federal agencies that have over-lapping or additional jurisdiction or environmental review responsibility for the proposed projects and the permits, licenses, and other authorizations include the following:

- MT Department of Environmental Quality

- MT Department of Fish, Wildlife and Parks

- MT Department of Natural Resources and Conservation

- MT Sage Grouse Habitat Conservation Program and Conservation Strategy

- U.S. Army Corps of Engineers

- U.S. Fish and Wildlife Service



These agencies have all been, or are in the process of being, notified of the proposed action and have been asked to provide comments. In accordance with Section 106 of the National Historic Preservation Act (NHPA) and USDA RD, the following agencies were also notified of the proposed action and asked to provide comments.

MT State Historic Preservation Office (SHPO)

Apache Tribe of Oklahoma

Crow Tribe of Montana

CSKT of the Flathead Reservation

Fort Belknap Indian Community of the Fort Belknap Reservation of Montana

Shoshone-Bannock Tribes of the Fort Hall Reservation

Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. The correspondence with the affected agencies is included in Appendix C.

7 REFERENCES

The agencies listed above in Chapter 6 have all been, or are in the process of being, notified of the proposed action and have been asked to provide comments. Comments throughout this document have been referenced to Appendix C for these correspondences.

The soils map and the SDA Prime and other Important Farmlands information for the area were downloaded from the NRCS website. The wetland map for the area was downloaded from the USFWS National Wetland Inventory and the floodplain map from the FEMA website. The NRCS Soils Map and the SDA Prime and other Important Farmlands information are included in Appendix A. The USFWS Wetland Map and FEMA Floodplain Map are included in Appendix D.

8 LIST OF PREPARERS

Jason Crawford, PE

Jake Hoffman, EI

APPENDIX A

SOILS AND LAND INFORMATION

112° 2' 53" W

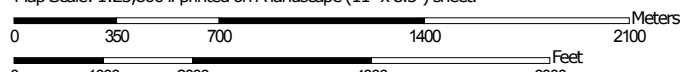


45° 53' 40" N

45° 51' 41" N

45° 51' 41" N

12° 7' 15" W



12° 2' 53" W

Soil Map—Jefferson County Area and Part of Silver Bow County, Montana
(Whitehall Area)

MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)

Soils



Soil Map Unit Polygons



Soil Map Unit Lines



Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Jefferson County Area and Part of Silver Bow County, Montana

Survey Area Data: Version 18, Sep 21, 2017

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Oct 14, 2015—Sep 28, 2016

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
4	Bronec, Clunton, Channeled, and Amesha soils, 0 to 8 percent slopes	0.4	0.0%
5	Borrow areas and Gravel pits	2.7	0.1%
6	Wetsand, Cardwell, and Clunton soils, 0 to 8 percent slopes, channeled	46.8	1.8%
9	Bronec, Riverrun, Channeled, and Amesha soils, 0 to 8 percent slopes	14.5	0.5%
13A	Anamac loam, 0 to 2 percent slopes	278.9	10.5%
13C	Anamac loam, 2 to 8 percent slopes	26.2	1.0%
18C	Brocko silt loam, 2 to 8 percent slopes	26.3	1.0%
22C	Zatony clay loam, 2 to 8 percent slopes	6.1	0.2%
23A	McKenton silt loam, 0 to 2 percent slopes	19.3	0.7%
37A	Pieriver silt loam, 0 to 2 percent slopes	21.8	0.8%
38C	Kalsted sandy loam, 2 to 8 percent slopes, low elevation	17.4	0.7%
69A	Meadowcreek silty clay loam, 0 to 2 percent slopes	16.5	0.6%
80C	Floweree silt loam, 2 to 8 percent slopes	2.7	0.1%
115C	Amesha gravelly loam, 2 to 8 percent slopes	502.7	18.9%
116A	Amesha loam, 0 to 2 percent slopes	27.1	1.0%
116C	Amesha loam, 2 to 8 percent slopes	165.0	6.2%
191E	Cabbart-Shoddy-Amesha complex, 15 to 45 percent slopes	20.3	0.8%
195E	Cabbart, very stony-Bronec, stony-Rock outcrop complex, 8 to 35 percent slopes	77.6	2.9%
195F	Cabbart, very stony-Rock outcrop-Bronec, very stony, complex, 25 to 60 percent slopes	6.6	0.2%

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
231A	Ledger-Moltoner-McKenton complex, 0 to 2 percent slopes	49.8	1.9%
232A	Clunton-Wetsand-Bonebasin complex, 0 to 2 percent slopes	122.9	4.6%
271C	Bronec-Amesha complex, 2 to 8 percent slopes	9.2	0.3%
271D	Bronec-Amesha complex, 8 to 15 percent slopes	205.6	7.7%
271E	Bronec-Amesha-Bronec complex, 15 to 35 percent slopes	182.8	6.9%
274E	Bronec-Bronec, very stony, complex, 15 to 45 percent slopes	19.4	0.7%
275E	Bronec very gravelly loam, 15 to 35 percent slopes, very stony	16.9	0.6%
321A	Fairway-Meadowcreek complex, 0 to 2 percent slopes	5.8	0.2%
324A	Fairway clay loam, 0 to 2 percent slopes	153.5	5.8%
325A	Fairway-Nestley clay loams, 0 to 2 percent slopes	141.3	5.3%
326A	Fairway-Moltoner complex, 0 to 2 percent slopes	245.0	9.2%
327A	Faith loam, 0 to 2 percent slopes	93.0	3.5%
401A	Moltoner silty clay loam, 0 to 2 percent slopes	71.9	2.7%
521A	Cardwell-Riverrun complex, 0 to 2 percent slopes	16.9	0.6%
523A	Cardwell-Riverrun-Pieriver complex, 0 to 2 percent slopes	21.8	0.8%
851D	Walbert-Shoddy-Cabbart complex, 2 to 15 percent slopes	27.6	1.0%
Totals for Area of Interest		2,662.1	100.0%

		Montana				importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151017	293D	Sieben cobbly loam, 4 to 15 percent slopes, stony	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151018	294C	Sieben, stony-Sieberell, very stony, complex, 2 to 15 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151019	295D	Sieben cobbly loam, 4 to 15 percent slopes, bouldery	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151020	296D	Sieberell-Sieben-Beaverell complex, 4 to 15 percent slopes, stony	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151021	297D	Sieben, very stony-Sieben, rubbly, complex, 2 to 25 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151022	297F	Sieben, rubbly-Sieben, very stony, complex, 15 to 60 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151025	311D	Beenom, stony-Wimper-Whitlash, very stony, complex, 4 to 15 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151026	311F	Beenom, stony-Wimper-Whitlash, very stony, complex, 15 to 45 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151028	321A	Fairway-Meadowcreek complex, 0 to 2 percent slopes	Prime farmland if irrigated
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151029	322A	Fairway loam, 0 to 2 percent slopes	Prime farmland if irrigated
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151030	323A	Fairway-McKenton silt loams, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151031	324A	Fairway clay loam, 0 to 2 percent slopes	Prime farmland if irrigated
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151032	325A	Fairway-Nestley clay loams, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151033	326A	Fairway-Moltoner complex, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151034	327A	Faith loam, 0 to 2 percent slopes	Farmland of statewide importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151035	328A	Faith loam, 0 to 2 percent slopes, cool	Farmland of statewide importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151037	329C	Faith-Slickens complex, 0 to 8 percent slopes, impacted	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151039	331C	Geohrock-Bronec gravelly loams, 2 to 8 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151040	331D	Geohrock-Bronec gravelly loams, 8 to 15 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151041	332D	Geohrock-Sappington complex, 4 to 15 percent slopes, stony	Farmland of local importance
MT	MT627	Jefferson County Area and	151042	334D	Geohrock, stony-Bronec, very stony,	Not prime

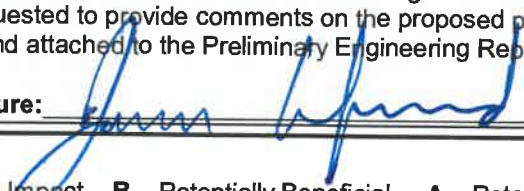
		Part of Silver Bow County, Montana			complex, 4 to 15 percent slopes	farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151045	341A	Pieriver-Cardwell-Riverrun loams, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151046	342A	Handke fine sandy loam, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151048	361D	Udecide-Varney-Walbert complex, 4 to 25 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151049	362C	Udecide-Varney sandy clay loams, 2 to 8 percent slopes	Farmland of statewide importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151050	371A	Havre-Ryell-Handke complex, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151051	372A	Havre loam, 0 to 2 percent slopes	Farmland of statewide importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151053	381C	Kalsted gravelly sandy loam, 2 to 8 percent slopes	Prime farmland if irrigated
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151055	382D	Kalsted gravelly sandy loam, 4 to 15 percent slopes, stony	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151059	391C	Musselshell-Crago gravelly loams, 2 to 8 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151062	394B	Musselshell-Crago cobbly loams, 1 to 4 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151064	401A	Moltoner silty clay loam, 0 to 2 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151067	411A	Nestley loam, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151069	413A	Nestley-Riverrun-Pieriver complex, 0 to 2 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151071	421E	Perma, stony-Whitlash, very stony, complex, 15 to 35 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151072	421F	Perma-Whitlash complex, 35 to 60 percent slopes, very stony	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151073	422F	Perma, very stony-Whitlash, very stony-Rock outcrop complex, 15 to 45 percent slopes, moist	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151074	423C	Wimper loam, 2 to 8 percent slopes	Farmland of statewide importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151075	423D	Wimper loam, 8 to 15 percent slopes	Farmland of local importance
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151076	423E	Wimper loam, 15 to 35 percent slopes	Not prime farmland
MT	MT627	Jefferson County Area and Part of Silver Bow County, Montana	151077	424D	Wimper-Wimper, stony, complex, 4 to 15 percent slopes	Farmland of local importance

APPENDIX B

PREVIOUS ENVIRONMENTAL EVALUATIONS

UNIFORM ENVIRONMENTAL CHECKLIST

As the engineer that prepared the preliminary engineering report, I Jason Crawford,
 (print name of engineer)
 have reviewed the information presented in this checklist and believe that it accurately identifies the environmental resources in the area and the potential impacts that the project could have on those resources. In addition, the required state and federal agencies were provided with the required information about the project and requested to provide comments on the proposed public facility project. Their comments have been incorporated into and attached to the Preliminary Engineering Report.

Engineer's Signature:  Date: 2/9/18

Key Letter: N – No Impact B – Potentially Beneficial A – Potentially Adverse
 P – Approval/Permits Required M – Mitigation Required

PHYSICAL ENVIRONMENT	
Key <u>N</u>	1. Soil Suitability, Topographic and/or Geologic Constraints (e.g., soil slump, steep slopes, subsidence, seismic activity) <i>Comments and Source of Information:</i> Engineers review of NRCS soils data.
Key <u>N</u>	2. Hazardous Facilities (e.g., power lines, EPA hazardous waste sites, acceptable distance from explosive and flammable hazards including chemical/petrochemical storage tanks, underground fuel storage tanks, and related facilities such as natural gas storage facilities & propane storage tanks) <i>Comments and Source of Information:</i> No anticipated impacts. (Engineer)
Key <u>N</u>	3. Effects of Project on Surrounding Air Quality or Any Kind of Effects of Existing Air Quality on Project (e.g., dust, odors, emissions) <i>Comments and Source of Information:</i> Temporary dust during construction. (Engineer)
Key <u>N</u>	4. Groundwater Resources & Aquifers (e.g., quantity, quality, distribution, depth to groundwater, sole source aquifers) <i>Comments and Source of Information:</i> Engineers review of well logs.
Key <u>N</u>	5. Surface Water/Water Quality, Quantity & Distribution (e.g., streams, lakes, storm runoff, irrigation systems, canals) <i>Comments and Source of Information:</i> Engineers review of closest surface water.
Key <u>N</u>	6. Floodplains & Floodplain Management (Identify any floodplains within one mile of the boundary of the project.) <i>Comments and Source of Information:</i> Engineers review of FEMA maps.
Key <u>N</u>	7. Wetlands Protection (Identify any wetlands within one mile of the boundary of the project.) <i>Comments and Source of Information:</i> Engineers review of MTNHP wetland inventory maps.

Key Letter: N – No Impact **B** – Potentially Beneficial **A** – Potentially Adverse
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<u>Key</u> N	8. Agricultural Lands, Production, & Farmland Protection (e.g., grazing, forestry, cropland, prime or unique agricultural lands) (Identify any prime or important farm ground or forest lands within one mile of the boundary of the project.) <i>Comments and Source of Information:</i> Engineers review of land use maps.
<u>Key</u> N	9. Vegetation & Wildlife Species & Habitats, Including Fish (e.g., terrestrial, avian and aquatic life and habitats) <i>Comments and Source of Information:</i> Temporary impacts to veg. during construction. (Eng)
<u>Key</u> N	10. Unique, Endangered, Fragile, or Limited Environmental Resources, Including Endangered Species (e.g., plants, fish, sage grouse, or other wildlife) <i>Comments and Source of Information:</i> Eng. review of USFWS endangered species in Jeff. C
<u>Key</u> N	11. Unique Natural Features (e.g., geologic features) <i>Comments and Source of Information:</i> No anticipated impacts. (Engineer)
<u>Key</u> N	12. Access to, and Quality of, Recreational & Wilderness Activities, Public Lands and Waterways (including Federally Designated Wild & Scenic Rivers), and Public Open Space <i>Comments and Source of Information:</i> No anticipated impacts. (Engineer)
HUMAN POPULATION	
<u>Key</u> N	1. Visual Quality – Coherence, Diversity, Compatibility of Use and Scale, Aesthetics <i>Comments and Source of Information:</i> No anticipated impacts. (Engineer)
<u>Key</u> N	2. Nuisances (e.g., glare, fumes) <i>Comments and Source of Information:</i> No anticipated impacts. (Engineer)
<u>Key</u> N	3. Noise -- suitable separation between noise sensitive activities (such as residential areas) and major noise sources (aircraft, highways & railroads) <i>Comments and Source of Information:</i> Temporary construction noise. (Engineer)
<u>Key</u> N	4. Historic Properties, Cultural, and Archaeological Resources <i>Comments and Source of Information:</i> No anticipated impacts. (Engineer)

Key Letter: N – No Impact **B** – Potentially Beneficial **A** – Potentially Adverse
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<u>Key</u> N	5. Changes in Demographic (population) Characteristics (e.g., quantity, distribution, density) <i>Comments and Source of Information:</i> No anticipated impacts. (Engineer)
<u>Key</u> N	6. Environmental Justice – (Does the project avoid placing lower income households in areas where environmental degradation has occurred, such as adjacent to brownfield sites?) <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	7. General Housing Conditions - Quality, Quantity, Affordability <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	8. Displacement or Relocation of Businesses or Residents <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> B	9. Public Health and Safety <i>Comments and Source of Information:</i> Eliminate uranium in drinking water.
<u>Key</u> N	10. Lead Based Paint and/or Asbestos <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	11. Local Employment & Income Patterns - Quantity and Distribution of Employment, Economic Impact <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	12. Local & State Tax Base & Revenues <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	13. Educational Facilities - Schools, Colleges, Universities <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	14. Commercial and Industrial Facilities - Production & Activity, Growth or Decline <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)

Key Letter: N – No Impact **B** – Potentially Beneficial **A** – Potentially Adverse
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<u>Key</u> N	15. Health Care – Medical Services <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	16. Social Services – Governmental Services (e.g., demand on) <i>Comments and Source of Information:</i> Potential increase in City O&M requirements (Engineer)
<u>Key</u> N	17. Social Structures & Mores (Standards of Social Conduct/Social Conventions) <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	18. Land Use Compatibility (e.g., growth, land use change, development activity, adjacent land uses and potential conflicts) <i>Comments and Source of Information:</i> Future land use will be similar to existing. (Engineer)
<u>Key</u> A	19. Energy Resources - Consumption and Conservation <i>Comments and Source of Information:</i> Potential increase in energy consumption. (Engineer)
<u>Key</u> P	20. Solid Waste Management <i>Comments and Source of Information:</i> Disposal of uranium will be permitted. (Engineer)
<u>Key</u> N	21. Wastewater Treatment - Sewage System <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	22. Storm Water – Surface Drainage <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> B	23. Community Water Supply <i>Comments and Source of Information:</i> Expected water quality improvements. (Engineer)
<u>Key</u> N	24. Public Safety – Police <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	25. Fire Protection – Hazards <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)

Key Letter: N – No Impact **B** – Potentially Beneficial **A** – Potentially Adverse
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<u>Key</u> N	26. Emergency Medical Services <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	27. Parks, Playgrounds, & Open Space <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	28. Cultural Facilities, Cultural Uniqueness & Diversity <i>Comments and Source of Information:</i> No changes anticipated. (Engineer)
<u>Key</u> N	29. Transportation Networks and Traffic Flow Conflicts (e.g., rail; auto including local traffic; airport runway clear zones - avoidance of incompatible land use in airport runway clear zones) <i>Comments and Source of Information:</i> Temporary traffic control during construction (Engineer)
<u>Key</u> N	30. Consistency with Local Ordinances, Resolutions, or Plans (e.g., conformance with local comprehensive plans, zoning, or capital improvement plans) <i>Comments and Source of Information:</i> Engineers review of Whitehall regulations. (Engineer)
<u>Key</u> N	31. Is There a Regulatory Action on Private Property Rights as a Result of this Project? (consider options that reduce, minimize, or eliminate the regulation of private property rights.) <i>Comments and Source of Information:</i> None anticipated. (Engineer)



Environmental Review Form

Whitehall Water System PER

March 2018

Table of Contents



1 Alternatives.....1

2 Mitigation2

3 Environmental Evaluations2

4 Public Involvement.....2

5 Person Responsible for Preparing.....2

6 Other Agencies2



1 ALTERNATIVES

Whitehall water system has several serious problems summarized as follows:

- both wells are old, pumps fail regularly, well #1 needs to be videoed and cleaned at a minimum, well #2 screen needs repairs,
- the system has been in violation of the uranium MCL since 2015, has entered an AOC with the DEQ, is facing violations if the conditions of the AOC are not met,
- the interior of the tank needs to be recoated (the town is working on this now),
- 4" and dead-end mains are present within the system (the town is working on these).

The well #1 casing has not been videoed recently but well #2 was videoed November 6, 2015. The video revealed the screen is in poor condition allowing gravel from the water bearing stratum to fall into the casing. Public works department indicated that both wells need work. According to the public works department, the pumps fail about every 3 years due to corrosion and are replaced.

The available DEQ records show the wells tested positive for arsenic since at least 2011; although, the running annual average MCL of 0.010 mg/L Arsenic hasn't need exceeded since at least 2011. The wells have also tested high for gross alpha readings, resulting in a running annual average greater than the MCL and gross alpha violations in 2014 and 2015. The town began monitoring the wells for uranium in 2015 and has been in violation of the running annual average MCL of 30 mcg/L uranium since 2015.

Whitehall entered into an AOC in January of 2017.

Following is the summary of the AOC compliance plan and schedule:

1. Groundwater Study Complete by October 1, 2017
2. PER Complete By March 2018
3. Grant Applications May 2018
4. Legislative Action of Grant Applications Early 2019
5. Grant Award September 2019
6. Construction Complete by August 1, 2020.

Alternatives have been presented in the PER to address the problems with the water system. A summary of the alternatives that were considered is included below.

- Alternative 1 -No Action
- Alternative 2 – New Surface Water Source
- Alternative 3 – New Ground Water Source
- Alternative 4A – IX Treatment Plant at Rec Complex Using Existing Wells
- Alternative 4B- IX Treatment Plant at Rec Complex Using 1 Existing Well and 1 New Well
- Alternative 4C – IX Treatment Plant in Old Firehall Using Existing Wells



The recommended preferred alternative from the PER is **Alternative 4B- IX Treatment Plant at Rec Complex Using 1 Existing Well and 1 New Well**

2 MITIGATION

With the implementation of the selected alternative there are no expected environmental impacts that would result in a need for mitigation measures. The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on Town owned property. The areas planned for disturbance are areas that have been previously disturbed that do not contain wetlands, areas of high groundwater, or areas of any other environmental concern.

3 ENVIRONMENTAL EVALUATIONS

The proposed improvements would be constructed within the Town of Whitehall incorporated limits either in streets or on Town owned property. The areas planned for disturbance are areas that have been previously disturbed that do not contain wetlands, areas of high groundwater, or areas of any other environmental concern. Plans and specifications for construction of the project would require DEQ review and approval prior to implementation. If areas of environmental concern are encountered during construction the contractor will be required to stop work and take appropriate measures to avoid adverse environmental impacts. At this time neither an Environmental Assessment nor an Environmental Impact Statement is warranted.

4 PUBLIC INVOLVEMENT

The public has been encouraged to participate in the project selection process. This Environmental Review Form and the Environmental Checklist was made available at Town Hall for public comment on March 19th. Notice was given at the March 19th council meeting that the documents were available for comment and also in the formal advertisement for the public hearing scheduled for April 9th, 2018. The findings of the PER and the environmental evaluations will be presented at the April 9th public hearing. Between March 19th and April 9th the public will be given the opportunity to ask questions and provide comments via letter or in person at the hearing. All public comments will be considered. At the April 9th meeting the Town will either approve the findings of the environmental evaluations or ask for additional environmental review.

5 PERSON RESPONSIBLE FOR PREPARING

Jason Crawford, Montana PE License Number 16054, with Triple Tree Engineering prepared the PER, the Environmental Checklist, and this Environmental Review Form.

6 OTHER AGENCIES

Other state, local, and federal agencies that have over-lapping or additional jurisdiction or environmental review responsibility for the proposed action and the permits, licenses, and other authorizations include the following:



MT Department of Environmental Quality

MT Department of Fish, Wildlife and Parks

MT Department of Natural Resources and Conservation

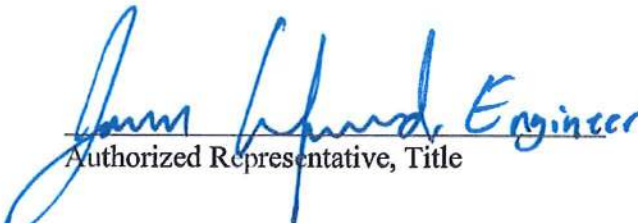
MT State Historic Preservation Office

MT Sage Grouse Habitat Conservation Program and Conservation Strategy

U.S. Army Corp of Engineer

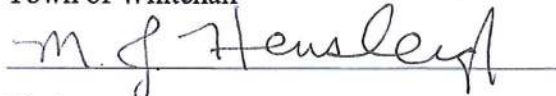
U.S. Fish and Wildlife Service

These agencies have all been or are in the process of being notified of the proposed action and have been asked to provide comments. Plans and specifications for construction of the project would require DEQ review and approval prior to implementation.


Authorized Representative, Title

3/19/18
Date

Town of Whitehall


Chairperson

Date:

3-29-18

APPENDIX C

AGENCY CORRESPONDENCE AND INFORMATION

TRIPLE TREE ENGINEERING



March 19, 2018

Department of Environmental Quality
Permitting and Compliance Division
1520 E. 6th Ave.
PO Box 200901
Helena, MT 59620-0901

RE: Whitehall Water Treatment Plant Request for Comment

To Whom It May Concern:

Early in 2017 Whitehall entered into an Administration Order On Consent (AOC) to address water system uranium maximum contaminant level (MCL) violations. The town has been in violation since 2015 when they were ordered to begin uranium monitoring. Included in the AOC are several steps to address the violation. One step includes preparation of a preliminary engineering report (PER).

The Town of Whitehall obtained Triple Tree Engineering to complete the PER. The PER documents the study, conclusions, and recommendations for the Town's water system facilities. The PER evaluates the existing system and establishes and prioritizes recommended courses of action and funding strategies for water improvements.

The selected alternative from the PER includes the construction of a uranium treatment plant and drilling and developing a new source water well at the Town owned recreation complex.

The areas for the potential improvements are identified on the attached schematic.

We are contacting your agency to identify any potential environmental impacts associated with the potential improvements. Please take a few moments to review the potential improvements and provide a written response detailing any potential environmental impacts. If we do not receive comments from your agency within 30 days, we will assume that you have no concerns at this time regarding the proposed improvements. If you have questions or comments, please contact me at 406-461-2115 or jcrawford@tripletreemt.com.

Thank You!

Sincerely,

Triple Tree Engineering, Inc.

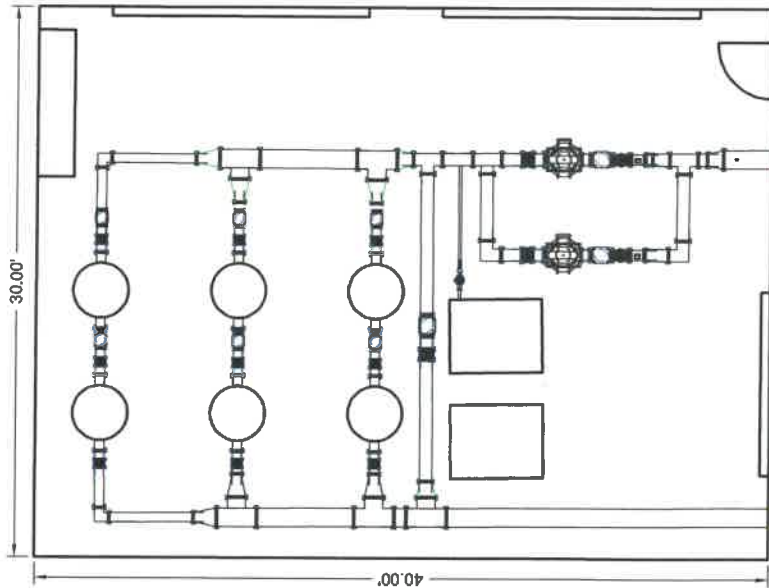

Jason Crawford, PE

3102 Old Broadwater Lane // Helena, MT 59601 // 406.461.0692
www.tripletreemt.com

ALTERNATE 4B
IX WTP AT REC COMPLEX
USING 1 EXISTING WELL
AND 1 NEW WELL
WHITEHALL, MT

17-001
MARCH 5, 2018

IX PLANT LAYOUT



LEGEND	
EXISTING PIPE	
---	4" CAST IRON
---	4" PVC
---	6" ASBESTOS CONCRETE
---	6" CAST IRON
---	6" PVC
---	8" CAST IRON
---	8" PVC
---	12" PVC
PROPOSED PIPE	
---	6" RAW WATER MAIN
---	12" RAW WATER MAIN
---	12" TREATED WATER MAIN



TRIPLE TREE ENGINEERING



March 19, 2018

Department of Fish, Wildlife and Parks
1420 E. 6th Ave.
Helena, MT 59620

RE: Whitehall Water Treatment Plant Request for Comment

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.

Jason Crawford, PE

TRIPLE TREE ENGINEERING



March 19, 2018

Department of Natural Resources and Conservation
1625 11th Ave.
PO Box 201601
Helena, MT 59620-1601

RE: Whitehall Water Treatment Plant Request for Comment

To Whom It May Concern:

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.

A handwritten signature in blue ink, appearing to read 'Jason Crawford', is written over the printed name. The signature is fluid and cursive.

Jason Crawford, PE



United States Department of the Interior

Fish and Wildlife Service

Ecological Services

Montana Field Office

585 Shepard Way, Suite 1

Helena, Montana 59601-6287

Phone: (406) 449-5225, Fax: (406) 449-5339



ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES MONTANA COUNTIES* Endangered Species Act

November 17, 2017

C = Candidate

LT = Listed Threatened

LE = Listed Endangered

P = Proposed

PCH = Proposed Critical Habitat

CH = Designated Critical Habitat

XN = Experimental non-essential population

*Note: Generally, this list identifies the counties where one would reasonably expect the species to occur, not necessarily every county where the species is listed

County/Scientific Name	Common Name	Status
BEAVERHEAD		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
BIG HORN		
<i>Mustela nigripes</i>	Black-footed Ferret	LE
BLAINE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Mustela nigripes</i>	Black-footed Ferret	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
BROADWATER		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
CARBON		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Zapada glacier</i>	Western Glacier Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
CARTER		
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
CASCADE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
CHOUTEAU		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
CUSTER		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
DANIELS		
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
DAWSON		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
DEER LODGE		
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
FALLON		
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
FERGUS		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
FLATHEAD		
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Lednia tumana</i>	Meltwater Lednian Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
GALLATIN		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
GARFIELD		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
GLACIER		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Lednia tumana</i>	Meltwater Lednian Stonefly	P
<i>Zapada glacier</i>	Western Glacier Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
GOLDEN VALLEY		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C
GRANITE		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
HILL		
JEFFERSON		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
JUDITH BASIN		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
LAKE		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Howellia aquatilis</i>	Water Howellia	LT
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Lednia tumana</i>	Meltwater Lednian Stonefly	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
LEWIS AND CLARK		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
LIBERTY		
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C
LINCOLN		
<i>Acipenser transmontanus</i>	White Sturgeon (Kootenai River Pop.)	LE
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
MADISON		
<i>Spiranthes diluvialis</i>	Ute Ladies' Tresses	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
McCONE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
MEAGHER		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
MINERAL		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
MISSOULA		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Howellia aquatilis</i>	Water Howellia	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
MUSSELSHELL		
PARK		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
PETROLEUM		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
PHILLIPS		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Mustela nigripes</i>	Black-footed Ferret	LE, XN
<i>Grus americana</i>	Whooping Crane	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
PONDERA		
<i>Charadrius melodus</i>	Piping Plover	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
POWDER RIVER		
<i>Grus americana</i>	Whooping Crane	LE
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
POWELL		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
PRAIRIE		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH

County/Scientific Name	Common Name	Status
RAVALLI		
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Coccyzus americanus</i>	Yellow-billed cuckoo (western pop.)	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
RICHLAND		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
ROOSEVELT		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
ROSEBUD		
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Grus americana</i>	Whooping Crane	LE
SANDERS		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Salvelinus confluentus</i>	Bull Trout	LT, CH
<i>Silene spaldingii</i>	Spalding's Campion	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
SHERIDAN		
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Grus americana</i>	Whooping Crane	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Calidris canutus rufa</i>	Red Knot	LT
SILVER BOW		
<i>Salvelinus confluentus</i>	Bull Trout	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
STILLWATER		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C

County/Scientific Name	Common Name	Status
SWEET GRASS		
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
TETON		
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Lynx canadensis</i>	Canada Lynx	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
TOOLE		
<i>Calidris canutus rufa</i>	Red Knot	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Pinus albicaulis</i>	Whitebark Pine	C
TREASURE		
<i>No listings at this time</i>		
VALLEY		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Charadrius melodus</i>	Piping Plover	LT, CH
<i>Calidris canutus rufa</i>	Red Knot	LT
WHEATLAND		
<i>Lynx canadensis</i>	Canada Lynx	LT
<i>Ursus arctos horribilis</i>	Grizzly Bear	LT
<i>Gulo gulo luscus</i>	Wolverine	P
<i>Pinus albicaulis</i>	Whitebark Pine	C
WIBAUX		
<i>Scaphirhynchus albus</i>	Pallid Sturgeon	LE
<i>Sterna antillarum athalassos</i>	Interior Least Tern	LE
<i>Grus americana</i>	Whooping Crane	LE
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	LT
<i>Charadrius melodus</i>	Piping Plover	LT
YELLOWSTONE		
<i>Grus americana</i>	Whooping Crane	LE
<i>Calidris canutus rufa</i>	Red Knot	LT

TRIPLE TREE ENGINEERING



March 19, 2018

US Army Corps of Engineers
10 West 15th Street, Suite 2200
Helena, MT 59626

RE: Whitehall Water Treatment Plant Request for Comment

To Whom It May Concern:

Early in 2017 Whitehall entered into an Administration Order On Consent (AOC) to address water system uranium maximum contaminant level (MCL) violations. The town has been in violation since 2015 when they were ordered to begin uranium monitoring. Included in the AOC are several steps to address the violation. One step includes preparation of a preliminary engineering report (PER).

The Town of Whitehall obtained Triple Tree Engineering to complete the PER. The PER documents the study, conclusions, and recommendations for the Town's water system facilities. The PER evaluates the existing system and establishes and prioritizes recommended courses of action and funding strategies for water improvements.

The selected alternative from the PER includes the construction of a uranium treatment plant and drilling and developing a new source water well at the Town owned recreation complex.

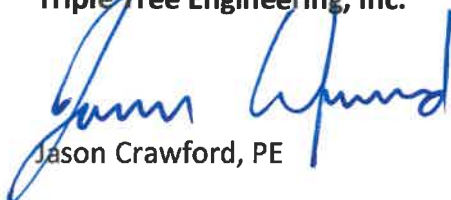
The areas for the potential improvements are identified on the attached schematic.

We are contacting your agency to identify any potential environmental impacts associated with the potential improvements. Please take a few moments to review the potential improvements and provide a written response detailing any potential environmental impacts. If we do not receive comments from your agency within 30 days, we will assume that you have no concerns at this time regarding the proposed improvements. If you have questions or comments, please contact me at 406-461-2115 or jcrawford@tripletreemt.com.

Thank You!

Sincerely,

Triple Tree Engineering, Inc.



Jason Crawford, PE

TRIPLE TREE ENGINEERING



March 19, 2018

U.S. Fish and Wildlife Service
Ecological Services
585 Shepherd Way
Helena, MT 59601

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.

Jason Crawford, PE

TRIPLE TREE ENGINEERING



March 19, 2018

Montana Natural Heritage Program
1515 East 6th Avenue, Box 201800
Helena, MT 59620-1800

RE: Whitehall Water Treatment Plant Request for Comment

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Thank You!

Sincerely,

Triple Tree Engineering, Inc.

Jason Crawford, PE



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
HELENA REGULATORY OFFICE
10 WEST 15TH STREET, SUITE 2200
HELENA, MONTANA 59626

March 26, 2018

Regulatory Branch
Montana State Program
Corps No. **NWO-2018-00555**

Subject: City of Whitehall (Triple Tree Engineering) - Water System Uranium Contamination Cleanup - Big Pipestone Creek - (Jefferson County)

Jason Crawford
Triple Tree Engineering
3102 Old Broadwater Lane
Helena, Montana 59601

Dear Mr. Crawford:

We are responding to your request for Department of Army comment regarding the above-referenced project. Specifically, you are proposing to construct a uranium treatment plant and drilling and developing a new source water well at the town owned recreation complex. The project is located at Latitude 45.870157°, Longitude -112.100114°, within Section 4, Township 1 N, Range 4 W, Principal Meridian, Jefferson County, Montana.

The mission of the U.S. Army Corps of Engineers (Corps) Regulatory Program is to protect the Nation's aquatic resources while allowing reasonable development through fair, flexible and balanced permit decisions. In particular, under Section 404 of the Clean Water Act, we work to protect the biological, physical, and chemical integrity of the Nation's aquatic resources. Projects are evaluated on a case-by-case basis to determine the potential benefits and detriments that may occur as a result of the proposal. In all cases an applicant must avoid and minimize impacts to aquatic resources to the greatest extent practicable.

Under the authority of Section 404 of the Clean Water Act (CWA), DA permits are required for the discharge of fill material into waters of the U.S. Waters of the U.S. include the area below the ordinary high water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. Isolated waters and wetlands, as well as man-made channels, may be waters of the U.S. in certain circumstances, which must be determined on a case-by-case basis.

Based on the information provided in your submittal, we are unable to ascertain if regulated activities are proposed or if jurisdictional waters of the U.S. are present within the project area. If your final design includes the placement of dredged or fill material in any jurisdictional area described above, or otherwise requires authorization by a DA permit, please submit a permit application to this office prior to starting any work. After a review of the materials submitted we will determine what type of permit, if any, will be required. In order to provide the necessary information you may use the Montana Joint Permit Application Form, found at the following address: <http://www.dnrc.mt.gov/licenses-and-permits/stream-permitting>. If you do not wish to use this form, or do not have internet access please contact our office at the address below to obtain more information.

-2-

Note that this letter is not a DA authorization to proceed. It only informs you of your need to obtain a DA permit if waters of the U.S. will be affected. If waters of the U.S. will not be affected by a jurisdictional activity a DA permit will not be required for the project.

Please refer to identification number NWO-2018-00555 in any correspondence concerning this project. If you have any questions, please contact Jade Clabaugh at 10 W 15th Street, Suite 2200, Helena, MT, 59626, by email at Jade.M.Clabaugh@usace.army.mil, or telephone at (406) 441-1365.

Sincerely,
CLABAUGH.JAD
E.METZLER.153
5431252

Digitally signed by
CLABAUGH.JADE.METZLER.1535431252
DN: c=US, o=U.S. Government, ou=DoD,
ou=PKI, ou=USA,
cn=CLABAUGH.JADE.METZLER.15354312
52
Date: 2018.03.26 11:39:41 -06'00'

Jade M. Clabaugh
Regulatory Project Manager



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Montana Ecological Services Office
585 Shephard Way, Suite 1
Helena, Montana 59601-6287

In Reply Refer To:
M.29 Public (I)
06E11000-2018-TA-
0305
06E11000-2018-
CPA-0066

March 29, 2018

Jason Crawford, P.E.
Triple Tree Engineering
3102 Old Broadwater Lane
Helena, Montana 59601

Dear Mr. Crawford:

Thank you for your letter dated March 19, 2018, requesting U.S. Fish and Wildlife Service (Service) comment on the Town of Whitehall Water Treatment Plant project. The proposed project will address water system uranium maximum contaminant level violations. The proposed project will consist of constructing a uranium treatment plant and drilling and developing a new source water well at the Town-owned recreation complex. The proposed project will be located within the City of Whitehall, Jefferson County, Montana. Your letter and a map of the proposed project area were received by our office on March 21, 2018.

Our comments are prepared under the authority of, and in accordance with, the provisions of the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.), Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, 54 Stat. 250), and the Endangered Species Act (16 U.S.C. 1531 et. seq.). Our comments do not address the overall environmental acceptability of the proposed action. We offer the following comments for your consideration.

Migratory Bird Treaty Act

We have reviewed the provided information on the proposed project and have determined that there could be potential effects to migratory birds. The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, and transportation, (among other actions) of migratory birds, their eggs, parts, and nests, except when specifically permitted. To the extent practicable, necessary vegetation clearing, grubbing, and filling construction activities should be scheduled so as to avoid and minimize impacts to nesting birds, if present in the project area. If work is proposed to take place in migratory bird habitats that may result in take of migratory birds, their eggs, or active nests, the Service recommends that the project proponent take all practicable measures to avoid and minimize take, such as maintaining adequate buffers, to protect the birds until the young have fledged. Active nests may not be removed. The Service has developed, and continues to revise and develop, general and industry-specific conservation measures for avoiding and minimizing impacts to birds (<https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>). We recommend that the proposed

project consider and incorporate these measures into project design, construction, and documentation as appropriate.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) prohibits anyone, without a permit issued by the Secretary of the Interior, from taking bald or golden eagles, including their parts, nests, or eggs. The BGEPA provides criminal and civil penalties for persons who take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof. The BGEPA defines “take” as pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb. “Disturb” means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior. In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagles return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

The Service is not aware of any known bald or golden eagle nests within one mile of the project. If active eagle nests are present within 0.5 mile of the project during construction, we recommend that the proponent comply with seasonal restrictions and construction / development distance buffers specified in the 2010 Montana Bald Eagle Management Guidelines: An Addendum to Montana Bald Eagle Management Plan (1994) in order to avoid/minimize the risk for eagle take.

Threatened and Endangered Species

Based on the proposed location of this proposed project within an existing municipal development setting, we do not anticipate its implementation would result in adverse effects to listed, proposed, or candidate threatened or endangered species, or listed or proposed critical habitat.

Additional Guidance

In addition to coordination with the Service, we recommend coordination with Montana Fish, Wildlife and Parks and the Montana Natural Heritage Program. These agencies may be able to provide updated, site-specific information regarding eagle and other raptor nests, as well as all other fish, wildlife, and sensitive plant resources occurring in the proposed project area. Contact information for these two agencies is below:

Montana Fish, Wildlife and Parks
1420 East Sixth Avenue
P.O. Box 200701
Helena, Montana 59620-0701
Phone: (406) 444-2535

Montana Natural Heritage Program
1515 East 6th Avenue, Box 201800
Helena, Montana 59620-1800
Phone: (406) 444-5354

This project should be re-analyzed if new information reveals effects of the action that may affect listed species or designated or proposed critical habitat (1) in a manner or to an extent not considered in this letter, (2) if the action is subsequently modified in a manner that causes an effect to a listed species or designated or proposed critical habitat that was not considered in this letter, and (3) if a new species is listed or critical habitat is designated that may be affected by this project.

If wetlands are impacted by this proposed project, Corps of Engineers Section 404 permits may be required. The Service suggests any proposed or future project be designed to avoid and minimize impacts to wetland areas, stream channels and surrounding vegetation to the greatest extent possible. Direct, indirect and cumulative impacts, along with future activities required to maintain these improvements, should be analyzed.

Thank you for the opportunity to comment on the Town of Whitehall Water Treatment Plant project. The Service appreciates your efforts to incorporate fish and wildlife resource concerns into your project planning. If you have further questions related to this issue, please do not hesitate to contact Karen Newlon at (406) 449-5225, extension 209.

Sincerely,



for Jodi L. Bush
Office Supervisor

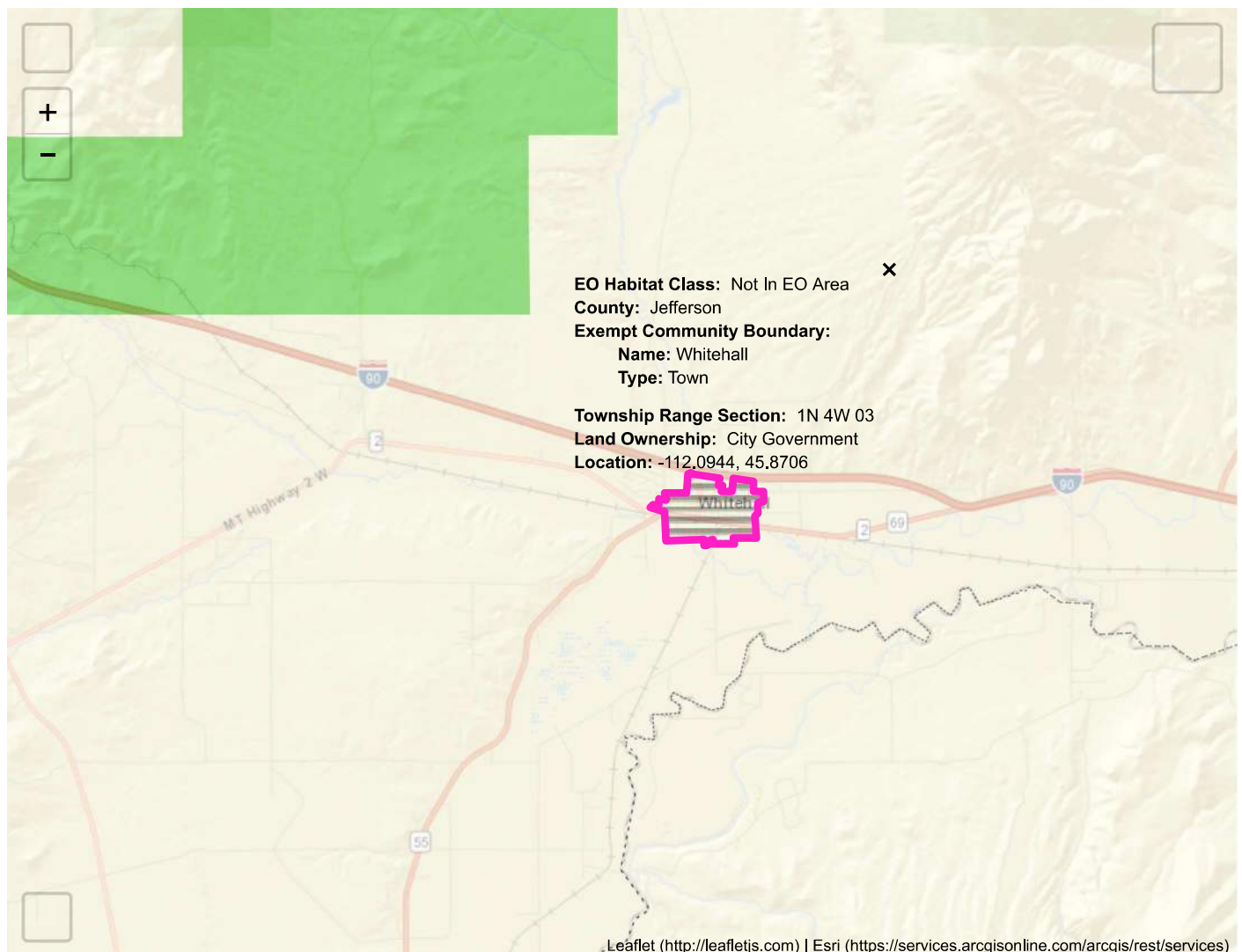
Photo Credit: Richard Producers

[Home \(/\)](#) ▶ [Montana Sage Grouse Habitat Conservation Map](#)

Montana Sage Grouse Habitat Conservation Map

Use this map to view and explore types of sage grouse habitat designated as core (blue), general (green), connectivity (light-blue) habitats or BLM priority areas. To zoom into an area, hold the Shift key and draw a rectangle. Anyone proposing new activities in sage grouse habitat must submit a project application (/ProposedProject/Instructions) for consultation.

If your project is close to designated sage grouse habitat or BLM Priority area, or if you are unsure your project is within designated sage grouse habitat or BLM Priority area, please submit your project for review as permitting agencies will be checking to see if your project is located within these designated sage grouse habitats. If your permitting agency requires evidence that your project is outside of designated sage grouse habitat, we recommend that you log in (/saml/login) and start a project application and take a screenshot of your project's location.



TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Lyman Guy
Chairman
PO Box 1330
Anadarko, OK 73005

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Lyman Guy:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *"If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standard (48 FR 22716, Sept.1983)."*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Apache Tribe of Oklahoma. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler



REVISIONS	
DATE	DESCRIPTION

WHITEHALL WATER SYSTEM IMPROVEMENTS - PART 1
TOWN OF WHITEHALL
WHITEHALL, MT

URANIUM TREATMENT FACILITY CONNECTIONS

PROJECT #:	18-49
DRAFTED BY:	JRC
CHECKED BY:	JRC
DATE:	12/10/2019
SHEET	#



TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Vernon Finley
Chairperson
PO Box 278
Pablo, MT 59855-0278

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Vernon Finley:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *"If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standard (48 FR 22716, Sept.1983)."*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the CSKT of the Flathead Reservation. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Mark Azure
President
656 Agency Main Street
Harlem, MT 59526

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Mark Azure:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *"If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standard (48 FR 22716, Sept.1983)."*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.
Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Darrin Old Coyote
Chairperson
PO Box 129
Crow Agency, MT 59022

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Darrin Old Coyote:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *"If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standard (48 FR 22716, Sept.1983)."*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Crow Tribe of Montana. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant Tribal Notification Letter

12/13/2019

Blaine Edmo
Tribal Chairman
PO Box 306
Fort Hall, ID 83203

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Blaine Edmo:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation to its applicants to initiate and proceed through Section 106 review. In accordance with this blanket delegation the Town of Whitehall is initiating Section 106 review on behalf of RUS.

In delegating this authority, RUS is advocating for the direct interaction between its Rural Development Program applicants and Indian tribes. RUS believes this interaction, prior to direct

TRIPLE TREE ENGINEERING



agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *“If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior’s Professional Qualification Standard (48 FR 22716, Sept.1983).”*

In accordance with this delegation, RUS may proceed to conclude review based on their concurrence in a finding of effect as recommended by the Engineer. Accordingly, the Engineer is submitting a recommended finding of *no historic properties affected* and supporting documentation for review and consideration by the Shoshone-Bannock Tribes of the Fort Hall Reservation. Please provide your concurrence or objection by January 20th, 2020. Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. The Town of Whitehall will respect the confidentiality of the information which you provide to the fullest extent possible. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if the Town of Whitehall or the Engineer do not receive a response from you by January 20th, 2020. Please direct any questions you may have to Engineer, Jason Crawford, at 3102 Old Broadwater Lane, Helena, MT 59601 or jcrawford@tripletreemt.com, or to USDA Area Specialist, Laura Sattler, at 790 Colleen St, Helena, MT 59601 or laura.sattler@usda.gov.

Sincerely,

Jason Crawford, P.E.

Enclosures: Maps

cc: Laura Sattler

TRIPLE TREE ENGINEERING



Rural Development Applicant SHPO Notification Letter

12/13/2019

Damon Murdo
Cultural Resources Manager
PO Box 201201
Helena, MT 59620

Subject:

Notification of Intent to Initiate Section 106 Review
Whitehall Water System Improvements
Whitehall, MT

Dear Damon Murdo:

The Town of Whitehall, located in Jefferson County, plans to seek financial assistance from the Rural Utilities Service (RUS) under its Rural Development Program for Water System Improvements. The proposed project consists of two parts. Part one of the project includes installing ion exchange treatment equipment inside the existing Town Hall public works shop, extending 3,000 feet of new underground watermain between the two existing wells and the shop, and cleaning and rehabilitating the two existing wells. Part two of the project includes recoating and repairing the Town's water storage tank, replacing the Town's last known remaining asbestos concrete watermain, and providing a distribution loop to the northern area of town currently being served by a dead-end water main. The project will be designed in accordance with DEQ requirements meeting Montana Public Works Standard Specifications, Sixth Edition. The proposed ROW is owned by Montana Rail Link, Montana Department of Transportation, the Town of Whitehall, and private owners. The extents of the project are in the Town of Whitehall incorporated limits. No ancillary facilities are anticipated.

The Town of Whitehall has been in violation of the EPA established Uranium MCL since 2015. The project will remove uranium in the towns drinking water to levels below the MCL. Whitehall has entered an administrative order of consent with DEQ to address the problems by August of 2020.

If RUS elects to fund this application, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review.

In accordance with this blanket delegation, Town of Whitehall is initiating Section 106 review on behalf of RUS. In delegating this authority, RUS is advocating for the direct interaction between its borrowers and the State Historic Preservation Office (SHPO). RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties earlier in project planning.

TRIPLE TREE ENGINEERING



The Town of Whitehall proposes that the area of potential effects (APE) for the referenced project consists of a pipeline corridor extending a total of approximately 3,000 feet from two existing wells to the public works shop at Town Hall, the street of Rocky Mountain Drive where the new pipeline is to replace the existing asbestos concrete watermain, and a 150 foot section of alleyway where the distribution loop is to be installed to the water system. The APE are shown on the enclosed maps. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1).

The areas planned for disturbance are areas that have been previously disturbed. The Engineer does not foresee or anticipate any negative impact to historical properties resulting from construction/installation of the project. If the loan/grant is approved, the following language will be incorporated into the Letter of Conditions to the lender and borrower: *“If any cultural materials are discovered during construction, work in the area shall halt immediately, the applicable federal agency must be contacted, the materials evaluated by and archaeologist or historian meeting the Secretary of the Interior’s Professional Qualification Standard (48 FR 22716, Sept.1983).”*

At the direction of RUS, the Town of Whitehall has notified and is seeking information about possibly affected historic properties in the APE from the following Indian tribes – Apache Tribe of Oklahoma, Crow Tribe of Montana, CSKT of the Flathead Reservation, Fort Belknap Indian Community of the Fort Belknap Reservation of Montana, and the Shoshone-Bannock Tribes of the Fort Hall Reservation.

Please review the project and enclosed maps. After completing your review, please provide the Town of Whitehall with your recommendation(s) about whether or not study of the APE is needed to identify affected historic properties. If you recommend study, please explain the nature and scope of the proposed investigation specifically in reference to those factors identified in 36 CFR § 800.4(b)(1).

Submit your recommendations within thirty (30) days of your receipt of this request to Jason Crawford, 406-461-2115 or at jcrawford@tripletreemt.com. If no timely response is received, the Town of Whitehall will notify RUS so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4). Should you have any questions, please contact Jason Crawford at jcrawford@tripletreemt.com.

Sincerely,

Jason Crawford, P.E.
Enclosures: Maps

cc: Laura Sattler

Jason Crawford

From: Murdo, Damon <dmurdo@mt.gov>
Sent: Wednesday, December 18, 2019 12:04 PM
To: Jason Crawford
Subject: RE: Whitehall Section 106 SHPO Letter
Attachments: 2019121703.pdf; CRABS.PDF; CRIS.PDF



December 18, 2019

Jason Crawford
Triple Tree Engineering
3102 Old Broadwater Lane
Helena MT 59601

RE: WHITEHALL WATER SYSTEM IMPROVEMENTS. SHPO Project #: 2019121703

Dear Mr. Crawford:

I have conducted a cultural resource file search for the above-cited project located in Sections 3, 4, T10N R3W. According to our records there have been a few previously recorded sites within the designated search locale. In addition to the sites there have been a few previously conducted cultural resource inventories done in the areas. I've attached a list of these sites and reports. If you would like any further information regarding these sites or reports, you may contact me at the number listed below

It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are to be altered and are over fifty years old, we would recommend that they be recorded, and a determination of their eligibility be made.

Based on previous disturbances in the proposed project area we feel that a recommendation for a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or if cultural materials be inadvertently discovered during this project we would ask that our office be contacted, and the site investigated.

If you have any further questions or comments, you may contact me at (406) 444-7767 or by e-mail at dmurdo@mt.gov. I have attached an invoice for the file search. Thank you for consulting with us.

Sincerely,

Damon Murdo
Cultural Records Manager
State Historic Preservation Office

File: USDA/RUS/2019

STATE HISTORIC PRESERVATION OFFICE

Montana Cultural Resource Database

CRABS Township, Range, Section Results

Report Date: 12/18/2019

Township: 1 N Range: 4 W Section: 3

ANDERSON PAUL

2/14/1983 CULTURAL RESOURCE INVENTORY AND EVALUATION: S549-1(1)0 WHITEHALL - SOUTH

CRABS Document Number: JF 4 4226 Agency Document Number: S549-1(1)0

Township: 1 N Range: 4 W Section: 4

ANDERSON PAUL

2/14/1983 CULTURAL RESOURCE INVENTORY AND EVALUATION: S549-1(1)0 WHITEHALL - SOUTH

CRABS Document Number: JF 4 4226 Agency Document Number: S549-1(1)0

Township: 1 N Range: 4 W Section: 4

BECK BARB S.

3/1/1987 CULTURAL RESOURCE RECORDATION AND EVALUATION OF THE JEFFERSON RANGER DISTRICT ADMINISTRATIVE SITES

CRABS Document Number: JF 1 4122 Agency Document Number: 87-DL-2-2

Township: 1 N Range: 4 W Section: 4

CAYWOOD JANENE M., ET AL.

3/11/1991 EVALUATION OF REGION 1 FOREST SERVICE-OWNED BUILDINGS FOR ELIGIBILITY TO THE NATIONAL REGISTER OF HISTORIC PLACES

CRABS Document Number: ZZ 1 13017 Agency Document Number:

Township: 1 N Range: 4 W Section: 3

BRUMLEY JOHN H.

8/1/2000 A CULTURAL RESOURCE INVENTORY OF THE PROPOSED TWIN BRIDGES TO WHITEHALL, MELROSE TO APEX, AND DILLON TO APEX TELEPHONE CABLE ROUTES

CRABS Document Number: MA 6 23097 Agency Document Number: BLM 00-MT-050-31

Township: 1 N Range: 4 W Section: 3

AXLINE JON A.

3/1/2000 INVENTORY AND ASSESSMENT: REINFORCED CONCRETE T-BEAM BRIDGES

CRABS Document Number: ZZ 4 24227 Agency Document Number:

Township: 1 N Range: 4 W Section: 4

FERGUSON DAVID M.

6/5/2002 A CULTURAL RESOURCES INVENTORY OF THE PROPOSED LIBERTY PLACE HEAD TRAUMA FACILITY IN WHITEHALL, JEFFERSON COUNTY MONTANA

CRABS Document Number: JF 6 24838 Agency Document Number:

Township: 1 N Range: 4 W Section: 4

FERGUSON DAVID

5/5/2002 A CULTURAL RESOURCE INVENTORY OF THE PROPOSED LIBERTY PLACE HEAD TRAUMA FACILITY IN WHITEHALL JEFFERSON COUNTY MONTANA

CRABS Document Number: JF 6 24839 Agency Document Number:

Township: 1 N Range: 4 W Section: 3

CAYWOOD JANENE M. AND JESSE ADAMS

12/23/2005 RESULTS OF A CULTURAL RESOURCE INVENTORY OF MONTANA DEPARTMENT OF TRANSPORTATION'S 2001-FENCING EAST OF WHITEHALL SAFETY IMPROVEMENTS PROJECT, JEFFERSON COUNTY, MONTANA

CRABS Document Number: JF 4 28207 Agency Document Number: STPH 69-1(22)1 CONTROL # 5018

Township: 1 N Range: 4 W Section: 4

ROSSILLON MITZI

12/19/2005 A CULTURAL RESOURCE INVENTORY AND SITE EVALUATION OF THE WHITEHALL-SOUTH HIGHWAY IMPROVEMENT IN JEFFERSON, MADISON AND SILVERBOW COUNTIES, MONTANA

CRABS Document Number: ZZ 4 28210 Agency Document Number: STPP 55-1(6)0

Township: 1 N Range: 4 W Section: 4

MCCORMICK MARY E.

10/1/1999 WHITEHALL STREET RECONSTRUCTION PROJECT, WHITEHALL, MONTANA: CULTURAL RESOURCE INVENTORY AND EVALUATION

CRABS Document Number: JF 4 30368 Agency Document Number: STPP 55-3(7)13

Township: 1 N Range: 4 W Section: 4

CHERULLO TAMMY

6/1/2011 JEFFERSON DISTRICT FENCE REPLACEMENT



STATE HISTORIC PRESERVATION OFFICE Montana Cultural Resource Database

CRABS Township, Range, Section Results

Report Date: 12/18/2019

CRABS Document Number: JF 1 32826 Agency Document Number: 11-BD-7-9

Township: 1 N Range: 4 W Section: 4

CHERULLO TAMMY

5/7/2014 WHITEHALL RANGER STATION OFFICE SPACE

CRABS Document Number: JF 1 37255 Agency Document Number: R2014010207007

STATE HISTORIC PRESERVATION OFFICE

Cultural Resource Information Systems

CRIS Township, Range, Section Report

Report Date:12/18/2019

Site #	Twp	Rng	Sec	Qs	Site Type 1	Site Type 2	Time Period	Owner	NR Status
24JF0538	1N	4W	4	NW	Historic Ranger Station		Historic Period	Forest Service	Eligible
24JF0767	1N	4W	3	NE	Historic Vehicular/Foot Bridge		Historic More Than One Decade	MDOT	Undetermined*
24JF0927	1N	4W	4	NW	Historic Irrigation System		Historic More Than One Decade	Private	Ineligible
24JF0927	1N	4W	4	SW	Historic Irrigation System		Historic More Than One Decade	Private	Ineligible
24JF0948	1N	4W	3	comb	Historic Railroad		Historic More Than One Decade	BLM	Eligible
24JF0948	1N	4W	4	comb	Historic Railroad		Historic More Than One Decade	BLM	Eligible
24JF1617	1N	4W	4	NE	Historic Commercial Development		Historic More Than One Decade	Private	Eligible
24JF1618	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1619	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1620	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1621	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1622	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1623	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1624	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1625	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1626	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1627	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1628	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1629	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1630	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1631	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1632	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Eligible
24JF1633	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1634	1N	4W	4	NE	Historic Political/Government		Historic More Than One Decade	Other	Eligible
24JF1635	1N	4W	4	NE	Historic Residence		Historic More Than One Decade	Private	Ineligible
24JF1862	1N	4W	4	NW	Historic Vehicular/Foot Bridge		Historic More Than One Decade	MDOT	Ineligible
24JF0550	1N	4W	4	NE	Historic Hotel/Motel		1910-1919	Private	NR Listed

APPENDIX D

FLOODPLAIN AND WETLAND MAPS

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources or small flows. The community map repository should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations** (BFEs) and/or **roadways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stream Elevation Tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevations presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Coastal Base Flood Elevations shown on this map apply only to landward of 500 feet North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stream Elevation Tables in the Flood Insurance Study report for this jurisdiction. Elevations shown in the Summary of Stream Elevation Tables should be used for construction and/or floodplain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **roadways** were computed at cross sections and interpolated between cross sections. The roadways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Roadway widths and other pertinent roadway data are provided in the Flood Insurance Study report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this jurisdiction.

The projection used in the preparation of this map was Universal Transverse Mercator (UTM) zone 12. The horizontal datum was NAD83. (GCS)83. Differences in datum, projection or UTM zones used in the production of FISs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of the FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same vertical datum. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at <http://www.ngs.noaa.gov/> or contact the National Geodetic Survey at the following address:

NOS Information Services
NCEA, NONGS-2
National Geodetic Survey
55M5-3, 60502
1315 East-West Highway
Silver Spring, MD 20910-3282

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242, or visit its website at <http://www.ngs.noaa.gov/>.

Base map information shown on this FIRM was provided by U.S. Geological Survey Digital Orthophoto Quadrangles produced at a scale of 1:25,000 from photography dated 1995 or later.

This map reflects more detailed and up-to-date **stream channel configurations** than those shown on the previous FIRM for this jurisdiction. The **roadways** and **floodways** that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study report which contain authoritative hydraulic data may reflect stream channel distances that differ from what is shown on this map.

Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or dis-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map showing the layout of map panels for this jurisdiction.

Contact the **FEMA Map Service Center** at 1-800-358-9616 for information on available products associated with this FIRM. Available products may include previously issued Letters of Map Change, a Flood Insurance Study report, and/or digital versions of this map. The FEMA Map Service Center may also be reached by Fax at 1-800-358-9620 and its website at <http://www.fema.gov/>.

If you have **questions about this map** or **questions concerning the National Flood Insurance Program** in general, please call 1-877-FEMA-MAP (1-877-366-2627) or visit the FEMA website at <http://www.fema.gov/>.

LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHA) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the **base flood**, is the flood that has a 1% chance of being equaled or exceeded in any given year. The **Special Flood Hazard Area** is the area subject to flooding by the 1% annual chance flood. Areas of **Special Flood Hazard** include Zones A, AE, AH, AO, AF, AR, V, and VE. The **Base Flood Elevation** is the water surface elevation of the 1% annual chance flood.

- ZONE A** No base flood elevations determined.
- ZONE AE** Base Flood Elevation determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); base flood elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined; the areas of abutment from flooding subjected also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently abandoned. Zone AR indicates that the former flood control system is being retained to provide protection from the 1% annual chance or greater flood.
- ZONE AV** Area to be protected from 1% annual chance flood by a natural flood protection system under construction; no base flood elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); base flood elevations determined.

FLOODWAY AREAS IN ZONE AE

The **floodway** is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with changes above less than 1 square foot, and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE B Areas determined to be outside the 0.2% annual chance floodplain.

ZONE D Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

OPAs are normally located within or adjacent to Special Flood Hazard Areas.

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